Copy given to Rob Hiley 9/21

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Response to Regulatory Comments on the Remedial Action Work Plan (RAWP)

L.E. Carpenter & Company
Wharton, New Jersey

NJD002168748

September 2004

346447

I APPROACH TO COMMENT RESPONSE

Comments from both NJDEP and USEPA regarding the RAWP cover a broad variety of issues, and LEC believes these comments can most effectively be addressed by combining them into specific groups of similar topics, and then focusing in on the key issues. The specific groups of topics and key issues outlined in this response document are as follows:

- **Extent of Source Reduction** – including extent of confirmatory sampling, cleanup criteria and delineation, and impact of the Impermix monolith on the hydrogeologic system.
- **Post-Remedial Action Groundwater Performance Monitoring** – including monitoring of the remediated zone and Monitored Natural Attenuation (MNA) of the surrounding groundwater.
- **Impacts to the Surrounding Environment**– including wetland delineations and restoration details, ecological impacts and issues related to the Rockaway River and sediments.
- **Costs and Schedule Issues** – issues specifically addressing the project schedule and costs (both current and projected),
- **Miscellaneous Remedial Action Issues** – including pre-construction as well as post-construction activities

This Comment Response Summary follows the general groups of topics outlined above. **Table 1** provides a cross reference to specific agency comments as listed in their respective letters. The item numbers referenced are either the section numbers as cited by NJDEP, specific comment numbers by USEPA, or by general comment from either agency.

II EXTENT OF SOURCE REDUCTION AND CONTROL

The following sections present LEC's response to those comments outlined in Section II of Table 1.

II.1 Confirmatory Sampling Density and Source Removal Effectiveness

Extent and Delineation of Lead: The excavation limits in the RAWP were planned to robustly encompass the removal of metals- and PCB-impacted soils exceeding cleanup objectives. These limits were based on an extensive number of vertical and horizontal sampling points installed over the past ten years. As shown in Figure 6 of the RAWP, extensive investigation paints a clear picture as to the limits of lead contamination. The extent of lead contamination in site soils was fully delineated in 4th quarter 2001 and documented in the report entitled *Nature and Extent of Lead in Soils and Groundwater Vol(s) I and II* (RMT, March 2002). Figure 2 of the March 2002 report shows lead concentrations in site soil and the associated limit of extent. This report, including the conclusions reached regarding the extent of lead in soils was accepted by NJDEP and USEPA. The proposed lead excavation area outlined in the RAWP was derived from this data.

TABLE 1
NJDEP & USEPA RAWP COMMENT SUMMARY

COMMENT RESPONSE OUTLINE & CROSS-REFERENCE	COMMENT	
	REGULATOR	ITEM
II. EXTENT OF SOURCE REDUCTION AND CONTROL		
1. Confirmatory Sampling Density and Source Removal Effectiveness	NJDEP	5.5.3. 5.5.5, 5.5.7, 3.6, RAWP p.3-8 Bullet 2
	USEPA	5a, 5b and 5c
2. Pre-Construction Activities	NJDEP	RAWP p.3-8 Bullet 2, 6.4 Conceptual Report, RAWP p. 6-1 Section 6.2
	USEPA	1, 5c
3. Post-Construction-Report	USEPA	1, 15
4. Excavation Design Issues	NJDEP	6.4 Conceptual Report
	USEPA	General Comments, 7c, 10
III. GROUNDWATER PERFORMANCE MONITORING & MNA		
Performance Monitoring and MNA	NJDEP	RAWP p. 6-1 Section 6.2, Comment No. 7
	USEPA	General Comments, 5b, 7a, 7b, 7c, 8, 9, 12
IV. ENVIRONMENTAL IMPACTS		
1. Wetlands	NJDEP	2.5.1, 6.13
	USEPA	6, 12a, 12b, 13,14
2. Ecological Issues	USEPA & USFWS	USFWS 5/24/04 Letter
3. Rockaway River Issues	USEPA	7d, 11
V. MISCELLANEOUS REMEDIAL ACTION (RA) ISSUES		
1. Pre-Construction and General Issue	USEPA	2, 3, 4
2. Post Construction Issues	USEPA	General Comments, 10
3. Air Monitoring During Construction	NJDEP	Emailed comment 8/26/04
VI. COST & SCHEDULE		
1. Cost	USEPA	General Comments
2. Schedule	USEPA	16
VII. ROCKAWAY RIVER PETROLEUM DISCHARGE		
Discharge, Emergency Response and Impact to Source Reduction project	NJDEP	Comment No. 7

Due to the potential Borough of Wharton end use scenario of a municipal complex with a park setting, the on-site soil cleanup objective for lead in soil was also lowered from 600 mg/kg (ppm) 1994 ROD cleanup criteria to a more stringent 400 ppm residential goal.

PCB Delineation: Both NJDEP and USEPA approved the PCB delineation outlined in the Weston report entitled Phase I ROD Implementation (Weston, 1994). To date, the PCB remedial action has not been implemented at LEC; however; the PCB area proposed for excavation in the RAWP was derived from the delineated area previously approved by the NJDEP and USEPA.

Proposed Confirmatory Sample Spacing: The lead and PCB confirmatory soil sample spacing outlined in the RAWP was derived from USEPA guidelines, and the grids were adjusted to be certain samples were included within the outer bounds of the planned excavations as defined by ten years worth of soil sampling data. Also, the sampling grids represent the minimum practical dimensions of working cells for excavation of both the lead- and PCB-impacted soil areas. The increase in the excavation size in the eastern PCB area, and the addition of lead soil excavation sidewall confirmatory samples should provide enough data to assure the removal of impacted PCB and lead soils.

PCB Confirmatory Sampling: LEC does not believe an increase in the vertical confirmatory sampling frequency or side wall sampling for PCB-impacted soils is necessary or beneficial, as previous investigations have clearly delineated the vertical and horizontal extent of the PCB source area(s). Please also note that the proposed PCB excavation is very shallow (the lesser of top of the water table or 2-ft bgs) as this area is located in the wetland area to the east (The Wharton Enterprise property).

Lead Excavation Side Wall Sampling: It is agreed that limited sidewall sampling of lead-impacted soil areas be performed at spacing not-to-exceed one discrete sample per 50 lineal feet of excavation wall in the lead-impacted area.

LNAPL Sampling: LEC does not intend to perform LNAPL confirmatory sampling. Collection of confirmatory samples that would be truly representative of soils underlying the major portion of free product smear zone while digging through slurry is problematic, and historic groundwater elevations data have enabled the accurate definition of the LNAPL smear zone. Data indicate that 622 feet above mean sea level (ft MSL) is the historic low shallow water table, and is subsequently the target depth for the LNAPL excavation. In addition, as is outlined in the RAWP and in the following responses, LEC intends on implementing a preconstruction boring program to verify historical smear-zone depth data and detail final excavation depths. Furthermore, a thorough post construction monitoring program will be developed in cooperation with USEPA and NJDEP to evaluate MNA and the potential impacts of any residual contamination on both surface and groundwater over the long-term. LEC intends to obtain regulatory input and approval(s) regarding all aspects of the long-term monitoring program (*i.e.*, monitoring locations, site hydraulics, analytes, sampling frequency, modeling *etc.*).

Clean Fill (Category C Material) Sampling: Discrete total lead soil samples will be collected from material excavated and stockpiled as clean fill for use later in the project at a frequency of one sample for every 300 in place cubic yards (IPCY) of material excavated and stockpiled.

PCB-Impacted Soil Cleanup Criteria: In the event that PCB-impacted soils are removed to below the 2 ppm Nonresidential Direct Contact Soil Cleanup Criteria (NRDCSCC), but not below the Residential Direct Contact Soil Cleanup Criteria (RDCSCC) of 0.49 ppm, deed restrictions will be placed on the Wharton Enterprise property. LEC is in the process of determining the use of deed restrictions at the Wharton Enterprise property. If deed restrictions are not an option, the PCB impacted area will be excavated to the 0.49 RDCSCC with confirmatory sampling implemented as outlined in the RAWP.

Extent of Free-Product Impacted Soils: The extent of free-product impacted soils was presented in detail in the report entitled *Findings and Recommendations Regarding a Conceptual Free-Product Remediation Strategy* (RMT, March 2002) (herein "the conceptual report") and formed the basis for the limits of the excavation in the RAWP. These limits were based on a large number of soil borings, wells and trenches installed over many years (Ref. Figure 6 in the RAWP). The goal of this source "reduction" action is to remove as much of the free-product as is "practicable," not to remove every possible molecule of contamination. Monitoring of free-product recovery has shown thicker pockets of free-product soils characteristically centered along the axis of the free-product zone. The RAWP specifically calls for excavation to elevation 622 (to the historical seasonal low water table) within the delineated zone to remove the vast majority of free product. The vast majority, specifically the DEHP component of the smear zone, will be bound up in the screened and solidified material excavated from the smear zone. However, LEC will have the ability if the situation or conditions warrant to try and containerize free product during the source reduction construction project for eventual off-site management if the need arises (*i.e.*, skimming free product with booms, etc. from the surface of groundwater that may accumulate in open excavations). LEC understands the importance of removing as much LNAPL as possible, and will certainly capitalize on the removal of free flowing recoverable product in the field if conditions arise.

II.2 Pre-Construction Activities

Pre-Construction Borings: The purpose of the pre-construction borings is to optimize the planning of excavation depths to the top of the smear zone, to identify areas needing control of potential free product, and to be sure that any areas of potentially product-depressed water table are encompassed within the zone of the Impermix blend. These borings are not intended to address the delineation of free-product or metals-impacted soils outside the planned excavation, as those limits have been well defined. Proposed locations of the pre-construction borings were based on historic investigation results and recent quarterly monitoring (*i.e.*, potentiometric surface and EFR data). Additional pre-construction boring locations may be advanced while in the field if further definition is needed based on site conditions at construction kickoff. Any modifications to the scope of work outlined in the RAWP will be documented in the Remedial Action Report (RAR).

RAWP and RAR Cross-Sections: The limits of all areas proposed for excavation are discussed in the RAWP, and depicted in both east/west and north/south oriented cross-sections (Ref. RAWP Figures 8, 10, and 11 through 18). LEC feels that adequate use of cross-sections to visually depict the proposed areas of excavation was provided in the RAWP. Cross-sections will be utilized in the RAR to depict the vertical component of actual excavations.

Well Abandonment: Of the total 97 site subsurface monitoring locations (*i.e.*, monitoring wells, well points, EFR wells and caisson wells), 67 of these locations as outlined in RAWP Table 7 will be abandoned by either grouting in place or over-drilling.

II.3 Post-Construction Remedial Action Report (RAR)

As outlined above, the RAWP presented numerous transects oriented toward the River illustrating the extent of contaminated soils and the planned areas of excavation. LEC will provide the locations and results of confirmatory sampling along with an overlay of original results to illustrate that metals- and PCB-impacted soils have been removed, and the extent to which product-impacted soils were excavated in the RAR. As outlined above, cross-sections depicting the actual excavations will also be presented in the RAR. The RAR will be submitted to both USEPA and NJDEP for review no later than 90 days following completion of the source reduction construction activities.

II.4 Excavation Design Issues

Free- and Residual Product Issues: As a clarification, the RAWP proposes that free product-impacted soils will be excavated to the historically low water table elevation of approximately 622 feet MSL. Because the use of dewatering techniques are not feasible at the site, use of an Impermix slurry will control the hydraulic problems that are anticipated when excavating into the smear zone below the water table. In addition, any visually observed quantities of floating free product that are practical to collect will be removed from the excavation, accumulated on-site in either drums and/or ASTs, and disposed as hazardous liquid waste. It is anticipated that any small amount of residual LNAPL constituents that may be attached to fine-grained soil particles and not removed by excavation will, instead, be entrained within the hardened Impermix Monolith. This will isolate the residual product from contact with groundwater.

Remedial Contingencies: Should post-construction monitoring suggest sufficient free product has not be removed to affect improvement in downgradient groundwater quality by means of natural attenuation, then contingent measures can be implemented which could include passive and active remedial scenarios. Determining the feasibility of post source reduction remedial measures for remaining measurable free product (if applicable) can only be performed post source reduction to take into account the significant changes in the monitoring network and site conditions.

Impact of Impermix Monolith: It is acknowledged that the presence of a lower permeability monolith may alter very shallow groundwater flow across the site. In fact, it is anticipated that this will help to minimize the solubilization of any small amounts of residual free product that may remain entrapped in the monolith after excavation in the smear zone is complete.

LEC also agrees that any increase in pH would be beneficial, further inhibiting the solubilization of metals in the soils. Regarding increased surface runoff potential and loss of metals-impacted soils to the river, LEC does not anticipate these issues to become problematic because 1) the heavily impacted soils (*i.e.*, lead, PCBs and process waste) will be removed from the site prior to the smear zone excavation and subsequent monolith installation; 2) soil erosion and sedimentation controls will be in place during and after construction with Best Management Practices (BMPs) as approved by both the NJDEP and Morris County Soil Conservation District (MCSCD); 3) the long-term use of the site will include cover materials and vegetation that will have a significant impact on infiltration potential as well as prevention of soil loss due to overland sheet flow, and 4) a substantial "buffer zone" of clean backfill will exist between the monolith and surface water bodies that will prevent any particulate runoff of LNAPL constituents. The presence of the monolith will be noted in any chain of title for the site.

III GROUNDWATER PERFORMANCE MONITORING AND MNA

The following sections present LEC's response to those comments outlined in Section III of Table 1.

III.1 MNA Work Plan

As requested by NJDEP and USEPA in previous letters summarizing review of various quarterly monitoring reports, LEC implemented the approved MNA sampling protocol outlined in the agency approved May 2001 *Workplan for Supplemental Investigation of Natural Attenuation of Dissolved Constituents in Groundwater* (MNA workplan). The MNA workplan was implemented in second quarter 2004 (2Q04) after installation of one of the three proposed wells (MW-19-10) in the MW19/Hot Spot 1 area was complete. Installation of two (2) monitoring wells MW-27 and MW-28 was postponed until surface water pooling in the Wharton Enterprise property as a result of excessive rain had cleared. It is likely that installation of these two wells will be performed after the source reduction project is complete due to the potential interference with the expanded excavation footprint now proposed for the Wharton Enterprise area (Ref. Appendix G of the 2Q04 Monitoring Report). The expanded excavation footprint is necessary to address the petroleum discharge into the Rockaway River identified during the 2Q04 monitoring event field activities (installation of PDB samplers). The release, subsequent emergency response activities, and the impact to the proposed source reduction excavation on the eastern portion of the LEC site is outlined Section VII of this response document.

III.2 Post-Remediation Monitoring Design

Upon completion of the source reduction remedial project, LEC will propose the installation of a representative sampling network (*i.e.*, monitoring wells, staff gauges, dedicated in-well equipment, pressure transducers *etc.*) to evaluate groundwater and surface water flow patterns and quality over the long-term. This network will include the necessary structures to monitor the presence of lead (although not detected in groundwater), LNAPL, and dissolved phase contaminants of concern in groundwater and surface water across the entire LEC site. Specifically, the hydraulics associated with the Rockaway River, the Wharton Enterprise wetland area, and the Air Products drainage channel will be closely monitored and modeled

to define accurate flow patterns. In addition, specific compliance points proposed for use as long-term water quality monitoring locations will be installed in each of these areas.

III.3 Post-Remediation Monitoring Plan (PRMP)

Specifics regarding the new site-wide monitoring network, changes to the approved MNA workplan regarding field and laboratory analytes, degradation products, sample frequency and location, analytical methods, field sampling techniques, flow patterns, and fate and transport modeling will be proposed to both USEPA and NJDEP in a Post Remediation Monitoring Plan (PRMP) for review and approval after the source reduction has been implemented. Appropriate measures to further evaluate groundwater effects, if any, on environmentally sensitive downgradient areas, and the measures to be instituted if groundwater contamination is detected in these areas will be addressed if site conditions warrant such action as determined by sampling the new site monitoring network.

III.4 Monitoring Updates and ROD Amendment

The results of the post source reduction monitoring events will be evaluated and numerically modeled to clearly define site wide flow patterns, and establish fate and transport data for remaining contaminants of concern. All data will be provided to USEPA and NJDEP on a quarterly basis for study and review. Once determined to sufficiently document the current and continued success of MNA at LEC (approximately 3 to 5 years), the data will be presented in a Focused Feasibility Study (FFS) proposing approval via ROD amendment of groundwater remediation by MNA as opposed to pump and treat as originally accepted (1994 ROD).

IV ENVIRONMENTAL IMPACTS

The following sections present LEC's response to those comments outlined in Section IV of Table 1.

IV.1 Wetlands

Wetlands Mitigation Plan: RMT and LEC are in the process of preparing a Wetland Mitigation Plan (WMP) summarizing 1) information specific to the proposed excavations within delineated wetland areas (PCB and LNAPL smear zone); 2) proposed restoration activities, and 3) proposed post-restorative monitoring activities. This plan will be submitted to NJDEP and USEPA for review and approval prior to the implementation of proposed remedial activities, and will also be included as an attachment to the *Freshwater Wetlands and Open Water Fill General Permit No. 4* [Hazardous Site Investigation and Cleanup] application. LEC requests that both the NJDEP and USEPA project managers assist in expediting approval of this application through their respective departments.

IV.2 Ecological Issues

Section 7 ESA Consultation: As outlined in the May 24, 2004 letter from the United States Fish and Wildlife Service (USFWS) to USEPA, RMT and LEC will initiate informal Endangered Species Act (ESA) Section 7 consultation with the USFWS regarding the proposed source reduction scope at the LEC site. Details regarding USFWS consultation and any associated documentation will be provided to NJDEP and USEPA for review. LEC requests that both the

NJDEP and USEPA project managers assist in expediting completion of the Section 7 ESA consultation process through their respective departments.

IV.3 Rockaway River Issues

Sediments and Hydraulics: Details regarding the site wide monitoring network proposed for installation after the source reduction is complete will be presented to both NJDEP and USEPA in the PRMP for review, input and discussion. The proposed monitoring network will be designed to adequately evaluate groundwater and surface water flow patterns and quality. RMT and LEC agree that discussions regarding the investigation of impacted groundwater into the Rockaway River (if applicable) and sediment quality (if warranted) are important issues as they relate to successful long-term site monitoring, but should not impact the approval to move forward with the source reduction project. In addition, regulatory agreement and approval to proceed with the installation of the proposed monitoring network as outlined in the PRMP needs to be in place, and initial data reviewed before a quantitative analysis of groundwater/surface water flow and impact and sediment quality can be performed.

V MISCELLANEOUS REMEDIAL ACTION (RA) ISSUES

The following sections present LEC's response to those comments outlined in Section V of Table 1.

V.1 Preconstruction and General Issues

RAWP Pilot Excavation UST Contingency Response: While performing the Pilot Excavations in February 2004, RMT uncovered a 5,000-gallon underground storage tank (UST) located near the Test Pit 1 (TP1) location. This tank was never identified in previous studies or investigations. The tank was removed, the contents drained, and the tank cleaned on February 18, 2004. The tank contained 990 gallons of free liquids and sludge. The material was analyzed for Resource Conservation and Recovery Act (RCRA) 8 metals, PCBs, Semivolatiles and Volatiles, pH, reactivity, and flammability. The material was mostly water but contained concentrations of volatiles (xylene) and semivolatiles (DEHP), exhibited the characteristic of flammability (D001). This material was taken to EQ Resource Recovery, Inc., in Romulus MI. Paperwork associated with these activities is attached.

Trucking and Local Community Issues: The trucking estimates discussed on June 15, 2004, have not changed. RMT and LEC have informed the Borough of Wharton, specifically Jon Rheinhardt, CFO, for over a year regarding the proposed source reduction remedial action, the project schedule and its potential disturbances to the local area. Pedestrian traffic crossing North on Main Street towards the forge pond as the Rails-to-Trails bridge and path will be closed; site security, truck routes and noise are issues that have been raised in discussions held with the Borough. The Borough is very supportive of the remedial action project, and has offered its assistance regarding all project related issues at the local level. Appropriate documentation regarding the remedial action project will be in place prior to construction mobilization.

V.2 Post Construction Issues

Remedial Contingencies: As outlined in Section II.4, should post-construction monitoring suggest sufficient free product has not be removed to affect improvement in downgradient groundwater quality by means of natural attenuation, then contingent measures will be implemented which could include passive and active remedial scenarios (*i.e.*, bio-augmentation, skimmers, pump and treat). Determining the feasibility of post source reduction remedial measures for remaining measurable free product (if applicable) can only be performed post source reduction to take into account the significant changes in the monitoring network and site conditions. RMT and LEC understand the importance of collaborating to develop the post remedial monitoring plan and remedial contingencies if MNA is unsuccessful, however; the details and decisions regarding this issue should not hinder approval to move forward with the source reduction as outlined in the RAWP.

Lead and Copper Soil Cleanup Objectives: RMT and LEC understand that USEPA approved site cleanup goals for copper in surface soil of 600 ppm, and a 400-ppm lead soil concentration given the future end use of this portion of the site as a park. RMT and LEC also understand that the NJDEP will require assistance supporting an Explanation of Significant Difference (ESD) for both the copper and lead soil issues, and will work with NJDEP to support both ESDs.

V.3 Air Monitoring During Construction

As required in the NJDEP email dated August 26, 2004, LEC will set up a weather station in conjunction with a strategically placed direct reading particulate/aerosol monitoring device with continuous data logging capability, similar to but not necessarily a Full RAMS with a multi-directional intake. A few days prior to construction kickoff, RMT will collect background particulate concentrations to establish preconstruction baseline lead specific air quality concentrations based upon existing atmospheric conditions. These units will be operated throughout the source reduction construction process and included in the RAR.

VI COST AND SCHEDULE

The following sections present LEC's response to those comments outlined in Section VI of Table 1.

Cost: LEC will provide a detailed cost estimate to compare the original groundwater remedy of pump and treat to long-term MNA in the FFS prepared to support a groundwater ROD Amendment (Ref. Section III.1).

Schedule: LEC will provide a detailed schedule outlining the relationship of all planned activities including preconstruction permitting and approvals, remedial action, ROD Amendment, and long-term monitoring.

VII ROCKAWAY RIVER PETROLEUM DISCHARGE

The following sections present LEC's response to those comments outlined in Section VII of Table 1.

As was outlined in the LEC 2nd Quarter 2004 Monitoring Report, while performing 2Q04 monitoring field activities, RMT personnel noticed a sheen on surface water flowing from the Wharton Enterprise

property to the east of LEC into the Rockaway River located along the southern site boundary. Within 24-hours, all emergency notifications including the National Response Center, NJDEP, and local agencies were made, and an emergency response contractor was mobilized to the site to install absorbent pads and booms (See attached May 17, 2004 emergency response documentation) in the Air Products drainage ditch and in the Wharton Enterprise sheen area at the bank of the Rockaway River. Presently, the emergency response contractor makes bimonthly site visits to visually inspect the booms and surrounding areas, and either flip or replace the booms and pads. Absorbent materials are replaced at least every month, and the materials (*i.e.*, booms, pads, PPE) taken off-site for disposal at least every 90 days. An access agreement is in place with Air Products to gain access to the absorbent materials in the drainage ditch, and open communication between LEC and Air Products exists regarding future remedial action.

As a result of this incident, RMT and LEC have increased the scope of the source reduction project specifically to the east of LEC within the Wharton Enterprise property. A total area of approximately 21,423 square feet (sqft) [0.492 acres] will be excavated down to the water table to facilitate to removal of both PCB and free product smear zone soils within the Wharton Property as outlined in the RAWP. This total area now also includes the area of surficial sheen/seep flow towards the Rockaway River. Excavation along the sheen/seep area accounts for an increase of 7,387 sqft of remedial excavation area when compared to the original RAWP area of 14,036 sqft (Ref. RAWP Figure 8). In addition, LEC potentially intends on relocating the 90-degree curved area of the Air Products drainage ditch based on the potential for LNAPL to exist up to and in the drainage ditch western bank, and in a small area of sediments existing in this curved ditch area. Please note that the wetlands, floodplain and stream encroachment related issues associated with the expansion of the source reduction scope in these areas will be incorporated into the pre-construction permit applications, the Wetlands Mitigation Plan, and the PRMP. Reference the attached Expanded Source Reduction Remedial Area drawing, which shows the expanded excavation areas to the east and the drainage ditch relocation.

REGULATORY RAWP COMMENTS

James E. McGreevey
Governor

State of New Jersey
Department of Environmental Protection

Bradley M. Campbell
Commissioner

Christopher Anderson
Director Environmental Affairs
L.E. Carpenter and Company
33587 Walker Road
Avon Lake, OH 44012

JUL 21 2004

RE: L.E. Carpenter Superfund Site
Wharton, Morris County, New Jersey

Dear Mr Anderson:

The New Jersey Department of Environmental Protection (NJDEP or Department) and the United States Environmental Protection Agency (USEPA) have completed a review of the document titled "Remedial Action Work Plan For Source Reduction" dated April 27, 2004. The document was prepared by RMT, Inc. on behalf of L.E. Carpenter and Company (LE). The NJDEP and the USEPA have the following attached comments which must be addressed.

Should you have any questions please feel free to contact me at (609) 633-1416.

Sincerely,

Anthony Cinque, Case Manager
Bureau of Case Management

C: Wharton Health Department
Nicholas Clevett, RMT
Stephen Cipot, USEPA
John Prendergast, BEERA
George Blyskun, BGWPA

From: Anthony Cinque
To: nicholas.clevett@rmtinc.com
Date: 7/14/04 4:43PM
Subject: LE Carpenter

Nick,

The NJDEP has completed its review of the document titled "Remedial Action Work Plan for Source Reduction" dated April 2004. The NJDEP has the following comments which must be addressed. Once I receive the USEPA's comments I will follow-up with a formal letter which combines USEPA/NJDEP comments.

2.5.1 Wetlands, page 2-9: The report states that N.J.A.C. wetland mitigation requirements provide that a temporary, non-forested wetland impact will only require restoration of the area temporarily disturbed. The NJDEP, Division of Land Use Management and Compliance should be given a copy of the RAWP for a review of the PCB impacted area. Also, the RAWP must include a Wetland Restoration Plan for the PCB impacted area on Wharton Enterprise property.

3.6 The Polychlorinated Biphenyl (PCB) Area, page 3-9: The ROD cleanup criteria for PCB contaminated soil on the Wharton Enterprise property was established at 2 ppm, the NRDCSCC for PCBs. The ROD Soil Cleanup Criteria for PCBs was established with the understanding that the Wharton Enterprise property would be issued a deed notice, otherwise the area would require remediation to the RDCSCC of 0.49 ppm.

5.5.3 Category A - Lead Soils Excavation, page 5-4: The report states that composite samples of soils from Area A-3 will be analyzed for lead to determine if they exceed the cleanup criteria of 400 mg/kg and must be removed from the site along with the Area A-1 and A-2 soils, or reused as backfill on the site. Soils that could potentially be reused as backfill may not be composited to determine their suitability as clean backfill. Only discrete soil samples for direct analysis are acceptable for clean determination. Compositing of soil samples is permitted for waste characterization purposes only, as the regulations allow.

5.5.5 Confirmatory Sampling - Metals Impacted Soils, page 5-5: The proposed post-excavation sampling on 40-by-40 foot grid basis is acceptable. The report proposes no sidewall perimeter post-excavation samples, on the basis that previous investigations have established the lateral extent of lead in soils. The elimination of perimeter post-ex samples may be permitted, however, the report must provide a figure that shows the previous collected samples and Pb results at the proposed excavation limits indicating the clean zone boundary.

5.5.7 Category J - PCB Confirmatory Sampling: The report states that soils will be removed to below the ROD-required 2 ppm level. As stated above, Wharton Enterprise property must accept a deed notice to establish that the RDCSCC have not been met.

6.13 Wetland Mitigation/Restoration, page 6-5: The report states that currently no backfilling of the PCB-impacted soil areas in the zone of the wetland will need to be accomplished. The specific details of the PCB area restoration, including long term maintenance must be provided in a Wetland Mitigation Work Plan.

Details pertaining to the recently reported petroleum discharge into the Rockaway River must be provided including necessary remedial actions as needed.

Depth of Excavation, page 3-8, Bullet 2: The report states that soil excavation below the water table is not practical due to high hydraulic conductivity and the resulting large volumes of water. The NJDEP cannot concur. LE is required to excavate to the level of the lowest historic water table so that the contaminated "smear" soil zone is removed and does not contribute to dissolved ground water contamination. It was the

NJDEP's understanding through previous discussions that excavation will proceed to the lowest historic ground water level. Accordingly, LE is required to comply with this requirement.

On page 6-4 of the document Findings and Recommendations Regarding a Conceptual Free-Product Remediation Strategy (3/02), LE estimates 4,700-9,700 gallons of free phase product remain in the aquifer, based on the Free Product Volume Analysis (RMT May 2000). LE also estimates 4,700-9,700 gallons of free phase product will be recovered during the remedial excavation activities. However, the most conservative "worst case" calculation indicates up to 5,000 gallons of free phase product could be left behind upon completion of the excavation. This volume of product would continue to be a long-term source of dissolved ground water contamination. LE must indicate what remedial measures would be implemented should the excavation/product removal be unsuccessful in removing all (or most) of the product.

Monitoring Well Abandonment, page 6-1, Section 6.2: LE indicates 72 of the 92 monitoring wells; well points or extraction wells will be abandoned. Upon completion of the source removal activities, evaluation of ground water flow patterns will dictate the location of replacement wells. Details on the final number and locations will be addressed in a separate submittal. This is acceptable, however the Department requires replacement wells in the former source areas to monitor product removal and in downgradient areas to monitor dissolved ground water contamination migration.

LE indicates 72 monitoring wells; wellpoints and extraction wells will be abandoned. However, review of Table 7 indicates 67. This discrepancy should be corrected.

Call me if you have any questions (609) 633-1416.

Anthony

CC: Blyskun, George; cipot.stephen@epamail.epa.gov; Prendergast, John

United States Environmental Protection Agency
Region 2
Emergency & Remedial Response Division
New Jersey Remediation Branch
290 Broadway
New York, NY 10007-1866

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Facsimile Transmittal Sheet

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To: Anthony Cinque

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Date: 7/15/04

Total # of pages including cover sheet: 13

Message:

UNITED STATES ENVIRONMENTAL PROTECTION AGENC
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUL 15 2004

Via fax and Mail

Anthony Cinque
Case Manager
Bureau of Federal Case Management
New Jersey Department of
Environmental Protection
401 East State Street
Trenton NJ 08625

Re: L.E. Carpenter Superfund Site, Wharton, NJ
Review and comment on the report entitled Remedial Actior Work Plan for Source Reduction, dated April 2004

Dear Mr. Cinque:

The U.S. Environmental Protection Agency (EPA) has completed it: review and comment on report entitled, Remedial Action Work Plan For Sourc : Reduction L.E. Carpenter Superfund Site, Wharton, NJ., and has attached comme nts. If you have any questions or comments on this letter, please feel free to discu :s them with me at (212) 637-4411, at your earliest convenience. Thank you for th e opportunity to review the above report.

Sincerely,

Stephen Cipot
Project Manager
Southern New Jersey Remediation Branch

Enclosure

ENCLOSURE

U.S. Environmental Protection Agency (EPA) comments on the Remedial Ac on Work Plan For Source Reduction for the Dayco/L.E. Carpenter Superfund Site, Wharton, N.

General Comments

The remedial action described in the Remedial Action Work Plan For Source Reduction, dated April 2004, consists of the following main components: the excavation and o -site disposal of lead process wastes and soils above 400 ppm, and copper above 600 ppm, equiring an Explanation of Significant Differences; the excavation of PCB impacted soils above 2 ppm; the removal or remediation of soils contaminated with LNAPL; and the conduct c groundwater monitoring to evaluate if Monitored Natural Attenuation (MNA) is a viable alte native to the pumping and treatment of the contaminated shallow groundwater that was o tlined in the 1994 Record of Decision (ROD). The latter was not described as part of the 1994 ROD, and may require an amendment to the ROD if implemented, after post remediation sa npling and monitoring data have been evaluated by the New Jersey Department of Envi onmental Protection (NJDEP) and EPA. The actions outlined in the above document v ll require an Explanation of Significant Differences (ESD), however, an ESD need not be nalized prior to completion of the remedial action.

Because of the large amount of water infiltration that had been encountered uring the lead and DNAPL excavation pilot study, replacement of excavated materials with a ce nent type monolithic slab was selected to stabilize side walls and prevent infiltration by unmanageable volumes of water. Use of a hardening slurry mixture will change the local pH as well as likely alter the hydraulics of the immediate area by increasing overland surface flo . Potential impacts must be properly monitored as part of this remedial action, and adv se affects, if any, remedied. A pH change, while not certain to result, will likely buffer and less n the mobilization potential for lead and other metals that may remain in soils, which would hav a positive benefit. However, considering the changes to be imposed on the hydrogeologic syst m, EPA also stresses that the previously approved MNA sampling program must be imple mented, along with the additional monitoring wells that EPA had the NJDEP had previously com nented on. Moreover, overland surface flow will likely increase, while infiltration will likel decrease, thus perhaps increasing impacts to the Rockaway River, such as increased meta loading coming from on-site areas where the soils cover might be missing or had not been p operly maintained. A lead level of 400 ppm is protective of human health, though may not be pr tective of the wetlands and river ecosystems, therefore appropriate monitoring and sedim nt drainage control must be implemented in the post construction/remediation phase to monitor or potential adverse impacts. Negative impacts will then need to be addressed in a time manner by submittal of additional corrective action work plan(s) and field work.

In addition, notice of the existence of the cement type monolithic slab that w remain after remediation, will be required to be placed in the chain of title to the property so that a potential future owner of the Site will be on notice of this structure in the subsurface.

The PRP's had previously proposed a capping remedy, that was subsequen y withdrawn, however, it contained a detailed cost estimate and comparison of the cappir g cost, versus the cost for implementing the selected ROD remedy. EPA will similarly need an updated detailed

cost estimate of the proposed remedy to compare to the original ROD remec to complete an ESD document that will be generated by the new proposed action. This cost estimate and comparison should be forwarded to the EPA and NJDEP as soon as possible

Specific Comments

1. In general, the site investigation presented in the work plan included only one geologic cross section, A-A', which intersects the center of the excavation area in an east to west orientation. It was not optimally situated or presented to illustrate the lead impacted area, LNAPL and smear zone, and clean soils, especially along the excavation area bordering the Rockaway River (Figure 18). Additional cross sections intersecting the site oriented toward the river with a cross section paralleling the river along the border of the excavation area would serve to illustrate the extent of contaminated soils and outline the intended work. The post excavation report must include a detailed delineation of these different soils throughout the excavation area, in order to make it easier to assess the effectiveness of the remedy as well as to determine how much contaminated soil was removed, and what the impact was to the river.

2. Page 4-2, what was the product that was contained in the underground storage tank that was removed during the recent pilot excavation work, was it sampled and analyzed, and what was volume and the concentration?

3. Page 5-1, The document did not present an estimate of the trucking numbers for hauling wastes to off-site disposal facilities. Per our conversation of June 15 with Nicholas Clevette, Mr. Clevette outlined some preliminary trucking numbers for hauling wastes to off-site, at 40 and 50 loads/day (6 days/wk), over a 4 month period. These numbers were said to be subject to change. Have the numbers changed, and has the township been notified that the remedial action will cause an increase in truck traffic on local streets? Formal notification should be done, and work of this nature must comply with local restrictions and ordinances. The PRP must contact the appropriate local authorities and report on the findings of this contact.

4. Page 5-1, Normally, a surface soil copper cleanup goal of 600 ppm might be questionable with regard to ecological risk, but if the site "end use" is ballfield (with tennis courts and parking lots), and site soils are to be covered with 1 2 feet of clean backfill plus 6 inches of topsoil, residual copper would probably not represent a significant threat to ecological receptors.

5a. Page 5-5 to 5-6, Spacing for Confirmatory Sampling. The Sampling grid is too coarse and needs to be refined and reduced; more samples are needed to confirm that remediation goals have been achieved. The PCB area in itself is not very large in aerial extent so that the proposed 35 foot grid sample spacing could very well overshoot the boundaries of the impacted area by a significant amount, leaving waste on-site. In addition, the 40 by 40 foot sample spacing for metals impacted soils, and a 50 by 50 foot horizontal grid sample spacing for the LNAPL waste, are similarly too coarse, and should also be reduced to a spacing that provides adequate sample coverage. At least 15 to 20 percent more samples may be minimally needed to verify remedial goals.

5b. Additional confirmatory sampling of the excavation side walls are nee ed to rule out if any contaminated soils possibly extend beyond the presently identifie areas. In addition, a post remediation monitoring plan must be submitted, if no prior to the remedial action, then at least concurrent, which includes geochemica data from additional monitoring wells, including from near the river; to evaluate ne presence of lead and LNAPL, and whether the excavation has effectively remedia ed residual contamination. An investigation of the potential groundwater dischar e zones into the river bed should be considered if LNAPLs or significant lead contami ation is detected in the groundwater near the river. In addition, refer to the general comi ent regarding the possible change in water pH, and increased possibility for overland fl w.

5c. The preconstruction soil borings may not be optimally located within nd surrounding the excavation area to confirm the horizontal extent and thicknesses of t e LNAPL smear zone, lead contaminated, and clean soils (Figure 31). The confirmat y PCB and metal sampling is only planned at grid sampling points across the floor of tl e excavation area. This provides no confirmation on the extent of contaminated soils be ond the periphery of the presently identified excavation area. Additional confirmation s mpling along the outside walls of the excavation areas is needed to evaluate to effecti eness of the soil excavation and slurry remediation.

6. Page 6-5, and 9-2, Wetlands: The size of the wetland excavation are a is not provided (sq. ft.), and the wetland excavation area is not depicted on a map. etails of wetland restoration are not provided, e.g., seeding and/or planting, the targe community type (palustrine emergent?), post-restoration monitoring, etc. If the undis rbed portions of the wetland are dominated by cattail, Phragmites, loosestrife, and re d canary grass (Appendix B), it will be difficult to prevent re-establishment of these s ecies in the adjacent excavated and restored wetland area.

7a. Section 9.0, Ground Water, Monitored Natural Attenuation (MNA). T e feasibility of Monitored Natural Attenuation has not been determined yet. The MI A of lead and LNAPLs in the groundwater must be adequate to prevent contamina on of the river.

7b. The MNA work plan that had been approved several years ago, mus be implemented.

7c. The effective natural attenuation of metals, especially lead, cannot b based solely on the monitoring results from existing wells and without knowing in ad nce the number and locations of any additional monitoring wells that will be installed Section 9.1). The natural attenuation mechanisms must be confirmed to be remediatir residual contamination in the soils and groundwater. The excavation of free oduct and lead contaminated soils, and the replacing of local soils with a hardened onolith could complicate the localized groundwater flow patterns, especially near e river, in terms of pH, altering the local hydrology as well as percolation of surface wa r and run-off. Additional long term monitoring wells should be specifically outlined nd agreed to, placed between the excavation area and the river to identify if any c ntaminated groundwater may end up discharging into the river.

7d. In addition, surface sediments samples may also be necessary.

8. Additional geochemical data, besides pH and Eh values, should be obtained from the monitoring wells along the river to assure that there is no unexpecte lead contamination of the groundwater and surface water which is not ve fied by the synthetic precipitation leaching procedure (SPLP) test results and/o the groundwater sampling results. Unfavorable changes in the dissolved oxygen, tot dissolved carbon, speciation of iron, sulfur, or nitrogen in the soil or groundwater may e evidence of lead and possibly LNAPL leaching into or migrating in the groundwater. uch changes could affect the sorption and ion exchange capacities of the aquifer matri for metals in addition to affecting the aquifer's buffering capacity. It is important determine the mass of lead that is dissolved in the groundwater, and its mass that sorbed and precipitated within both the suspended solids and the aquifer matrix.

The long term monitoring plan must prove that the following is not oc urring in order to confirm adequate natural attenuation:

- Changes in the geochemical or hydrologic environment that c uld inhibit remedy effectiveness such as pH, hydraulic gradients, oxygen levels nd, organic carbon;
- That the contaminated groundwater is expanding both horizo ally or vertically;
- That lead, LNAPLs and other site related contaminants are re ching downgradient receptors which in this case is the Rockaway R er;
- Detection of any unexpected sources of lead and LNAPLs tha could impact the effectiveness of the selected remedy; and,
- The formation of toxic transformation products such as organi lead complexes.

9. MNA monitoring should continue for a specified period of at least two years, after cleanup levels have been achieved and in at least two additional wells between the excavation sites and the Rockaway River. Monitoring must be long e ough to assure that no re-contamination is occurring in the groundwater and that the is no subsequent discharge of lead or LNAPL into the river.

10. No provision has been made in event that excavation and MNA remec es fail to perform as anticipated, within a specified time frame. The outlined remedy in e Remedial Action Work Plan For Source Reduction must include a Contingency l an, that will be developed and implemented if excavation and MNA fail to work, whic may include the original groundwater remedy of actively pumping and treating contami ated groundwater outlined in the 1994 ROD.

11. If lead or LNAPL are detected by the long term monitoring of the grou dwater, seepage meters could be used to locate potential areas of groundwater discha e to the river. Seepage meters or buried passive bag sampling could provide extens e data on the pore water characteristics along the river bottom. When compared to nown groundwater characteristics, particularly temperature, this pore water ata may reveal the extent of any groundwater discharges. Several transects or grids f seepage

meters could be placed in parts of the river suspected to be impacted by contaminated groundwater migrating from the site. Any seepage meter transects should be first based on a comprehensive analysis of the vertical and horizontal groundwater flow patterns and an initial temperature profile screening of the river bottom.

12. Groundwater Modeling, page 9-1 mentions that groundwater modeling will be performed to help determine the viability of MNA for the next phase of remedial action. As mentioned in the general comment, if MNA is selected for residually contaminated groundwater, as well as for the MW-19 hot spot groundwater contamination area, then a ROD amendment will be necessary. When will the modeling task be performed? Prior to implementation of modeling, a modeling work plan will need to be submitted, reviewed and approved by the NJDEP and EPA. The modeling work plan must clearly spell out as a minimum the type of modeling that will be conducted, input and output parameters, specific goals that the modeling aims to achieve, and the utility of the proposed model for achieving those goals.

12a. Wetlands, page 9-2. According to the document, there will be wetland impacts associated with the remedy, however, no details are provided regarding wetland restoration (e.g., seeding/planting, community type, post-restoration monitoring, etc.). As per Clean Water Act, Section 404, Protection of Wetlands E.O. 11990, 40 CFR 6 App A, a wetlands assessment and restoration plan will be need to be submitted for any wetlands impacted or disturbed by the remedial activities.

12b. Additionally, whenever possible, Management Practices (according to Federal Register Vol. 51, No. 219, Part 330.6) should be followed to minimize unavoidable impacts (e.g., spread of contaminants, impact of roadways) to wetlands to the maximum extent practicable while designing/implementing the remedy. Should you require additional information regarding wetland issues, John Cantilli of the of the Water Programs Branch is available for assistance, at 212-637-3810.

13. Similar to the above, Sections 2.5.1 and Section 6.13, mentions that PCB impacted soil is proposed to be removed from the wetland. The discussion of this activity should indicate the approximate square foot area of wetlands that will be impacted and excavated. It would also be useful to include a footprint of the impacted area on site maps, as well as on a wetlands delineation map.

14. Section 5.7, the discussion pertaining to the conceptual end use plan for the site mentions an area that would become wetland habitat. It should be clarified if this area is a new wetland that will be created or if it is the restoration of the wetland that will be excavated as part of the remedy. The area should be located on a map.

15. When will the Remedial Action Report be submitted? It should be submitted between 60 to 90 days after the remedial action has been completed.

16. A project schedule is needed. In addition, a detailed time line and flow chart that outlines the relationship of all planned activities and submittals should be provided to the EPA and NJDEP, at least several weeks prior to implementation of the proposed remedial action.

United States Department of the Interior Comment Letter, dated May 24 2004, Signed by Timothy Kubiak

Please See Separate Attachment Letter from the United States Department of the Interior.

United States Department of the Interior

FISH AND WILDLIFE SERVICE

New Jersey Field Office
Ecological Services
927 North Main Street, Building D
Pleasantville, New Jersey 08232
Tel: 609/646 9310
Fax: 609/646 0352
http://njfieldoffice.fws.gov

In Reply Refer to:

EC-04/45

MAI 2 4 2004

Mr. Stephen Cipot, Remedial Project Manager
U.S. Environmental Protection Agency, Region II
Emergency and Remedial Response Division
Program Support Branch
290 Broadway, 18th Floor
New York, New York 10007-1866

Dear Mr. Cipot:

The U.S. Fish & Wildlife Service (Service) New Jersey Field Office has revi wed the April 2004 *Remedial Action Work Plan (RAWP) for Source Reduction* prepared for the l E. Carpenter & Company Site (Site), Wharton, Morris County, New Jersey, and offers the fc owing comments as technical assistance.

The Service is pleased that the RAWP reflects the March 27, 2003 comment forwarded through the Biological Technical Assistance Group (BTAG), and discussed during th October 7, 2003 meeting with Site representatives at the U.S. Environmental Protection Agen y's (EPA) Edison, New Jersey facility.

Under Section 2.5 Natural Resource Issues, a discussion of the Rockaway Ri er and its designated uses should have been included. Specifically, that portion of the ockaway River which borders the Site is classified under N.J.A.C. 7:9B-1.15 as Freshwater Trout Maintenance (FW2-TM) Category 1 (C1). The State-designated uses of FW surface waters as defined in N.J.A.C. 7:9B-1.12(c) include: maintenance, migration and propa tion of the natural and established biota; primary and secondary contact recreation; industrial ar agricultural water supply; public potable water supply after legally required treatment; and any ther reasonable uses. Trout maintenance surface waters are designated for the support of tro throughout the year. Moreover, C1 surface waters are designated for purposes of implement ng the antidegradation policies set forth at N.J.A.C. 7:9B-1.5(d), for protection fro measurable changes in water quality characteristics because of their clarity, color, scenic tting, other characteristics of aesthetic value, exceptional ecological significance, excepti nal recreational significance, exceptional water supply significance, or exceptional fisheries source(s). The Service recommends that the State designated uses of the Rockaway River be ncorporated into the subject document.

The RAWP states (on page 2-10) that the Service's Great Swamp National W dlife Refuge (GSNWR) was consulted to confirm the current status of federally listed thre ened and endangered animal and plant species occurring in New Jersey. Although kno ledgeable, the

GSNWR is not the appropriate Service office for threatened and endangered species consultation. This review and coordination with the GSNWR does not constitute consultation under the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*). The EPA initiated informal ESA Section 7 consultation for the Site with the Service in a letter dated May 1, 1991 (enclosed). In response, the Service determined, in a letter dated June 3, 1991 (enclosed), that the federally listed as threatened plant swamp pink (*Helonias bullata*) was documented within 10 miles of the Site, and that a survey for this species in Site-associated wetlands be conducted if those wetlands would be impacted by the remedial action. A review of our administrative record did not reveal any additional consultation. As there have been significant modifications to the project since 1991, reinitiating informal consultation pursuant to Section 7 of the ESA is required. The EPA should direct representatives of J.E. Carpenter & Company to reinitiate informal Section 7 consultation with the Service's New Jersey Field Office, located in Pleasantville, New Jersey, prior to the commencement of the remedial action. Please direct informal consultation reinitiation correspondence to:

Darren Harris
U.S. Fish & Wildlife Service
New Jersey Field Office
927 N. Main Street, Bldg D
Pleasantville, New Jersey 08232
609/646-9310, extension 44.

To expedite informal consultation, refer to control # EC-04/45 in your request. Moreover, pursuant to 50 CFR Part 402.09, no federal agency or any applicant shall make irreversible or irretrievable commitment of resources which has the effect of foreclosing the formulation or implementation of any reasonable and prudent alternatives which would avoid violating Section 7(a)(2) of the ESA. This prohibition is in force during the consultation process and continues until the requirements of Section 7(a)(2) are satisfied.

In Appendix M, page 16, section IV.6.5 Endangered Species, the Service is unclear as to what habitat survey report is being referred to in the EPA comments. Again, reinitiating informal consultation pursuant to Section 7 of the ESA is required.

The Service appreciates the opportunity to review the subject document, and is interested in reviewing any future Site-related documents. If you have further questions, please contact Environmental Contaminants Specialist Clay Stern of my staff at 609/383-3938, extension 27.

Sincerely,

Timothy Kubiak
Assistant Supervisor

Enclosures (2)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278

MAY 01 1991

Mr. Clifford G. Day
Field Supervisor
U.S. Fish & Wildlife Service
927 North Main Street (Bldg. D)
Pleasantville, New Jersey 08232

Dear Mr. Day:

This letter is intended to initiate informal consultation with the U.S. Fish and Wildlife Service to determine if there are any federal endangered/threatened species or critical habitats present in the vicinity of the Dayco/L.E. Carpenter National Priorities List Site. This site is located in Wharton, Morris County, New Jersey. I have enclosed information regarding the site, including maps of the affected area, for your review.

In compliance with the mandate of Section 7 of the Endangered Species Act of 1973, as amended, EPA is requesting a written statement from you indicating whether any endangered or threatened species which are listed or proposed to be listed may be present in the project area. Please advise us concerning the range of territory covered by any federal endangered/threatened species that may be found in the area, and whether remedial action for the site may result in impacts to these species.

If you have any questions or require additional information, please contact Susan Osofsky of my staff at (212) 264-6716. We appreciate your assistance in this matter.

Sincerely yours,

Robert W. Hargrove, Chief
Environmental Impacts Branch

Enclosure

cc: A. Miller, DOI
P. Nickerson, F&WS

United States Department of the Interior
FISH AND WILDLIFE SERVICE

Fish and Wildlife Enhancement
927 North Main Street (Bldg. D1)
Pleasantville, New Jersey 08232

Tel: 609-646-9310
FAX: 609-646-0352

IN REPLY REFER TO:

ES-91/89

June 3, 1991

Mr. Robert W. Hargrove, Chief
Environmental Impacts Branch
U.S. Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

Dear Mr. Hargrove:

This letter is in response to your May 1, 1991, request to the ish and Wildlife Service (Service) for information on the presence of derally listed and proposed endangered and threatened species within the study area of the Dayco/L.E. Carpenter National Priorities List Site in Wharton, orris County, New Jersey.

This response is provided pursuant to the Endangered Species Ac (Act) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) to ensure t protection of endangered and threatened species and is intended to assist yo assessments, investigations and planning being conducted pursuant to Sectio 104 (a) of the Comprehensive Environmental Response, Compensation and Liabili Act as amended by the Superfund Amendments and Reauthorization Act. ese comments do not represent any position the U.S. Department of the Inter r may adopt concerning possible injury to natural resources under the Depa ment's trusteeship.

The federally threatened plant species *Helonias bullata* (swamp ink) is documented to exist in forested wetlands within 10 miles of th project study area. This population is the northernmost occurrence for the ecies in the United States. We have reviewed the Service's National Wetlan Inventory map for the project area and note there are palustrine forested we ands at the project site, therefore, it is possible that swamp pink could present. If these wetlands will be impacted by the proposed project, we re mmend that a survey be conducted to determine the absence or presence of sw p pink. The results of the survey should be forwarded to this office for r iew. Except for an occasional transient Bald Eagle (*Haliaeetus leucocepha*) or Peregrine Falcon (*Falco peregrinus*), no other federally listed or propos threatened or endangered flora or fauna are known to occur in the proposed s dy area.

Enclosed is a summary of federally listed and candidate speci in New Jersey for your information. Candidate species are those species und consideration by the Service for possible inclusion on the List of Endangere and Threatened Wildlife and Plants. Although these species receive no substa ive or procedural protection under the Endangered Species Act, the Se ice encourages federal agencies and other planners to consider candidate spec s in the

project planning process. The New Jersey Natural Heritage Program provides the most up-to-date data source for candidate species in the State, as well as maintaining information on State listed species, and may be contacted at the following address:

Mr. Thomas Breden
Natural Heritage Program
Division of Parks and Forestry
CN 404
Trenton, New Jersey 08625
(609/984-0097)

Further information on State listed species may be obtained from the following office:

Ms. JoAnn Frier-Murza
Endangered and Nongame Species Program
Division of Fish, Game and Wildlife
CN 400
Trenton, New Jersey 08625
(609/292-9101)

Please contact Dana Peters of my staff if you have any questions or require further assistance regarding threatened or endangered species.

Sincerely,

Clifford G. Day
Supervisor

Enclosures

UST SAMPLING, CLEANING AND REMOVAL PAPERWORK

Rapid Response

RAPID RESPONSE Inc.
14 Brick Kiln Court, Northampton, PA 18067
Tel. (484) 275-6900 Fax (484) 275-6970
www.RRI - hazmat.com

DAILY RECORD

Project #: Tank removal- Wharton, NJ Date: Tuesday, February 17, 2004

Customer: RMT Inc Customer Contact: Walter Kurzeja

Job Location: Wharton, NJ Customer Phone: 616-633-4247

Names	Code	Start	On Site Start	On Site Finish	Finish
J. Solt	RM	14:00			2000
S. Nothstein	RT	14:00			2000
B. Rehrig	RT	14:00			2000

QTY.	Material Description
3	Health and Safety Level D
2	Sample Analysis

EQUIPMENT	QTY	EQUIPMENT	QTY	DISPOSAL / MANIFEST
Response Trailer	1			
Response Truck	1			
Utility Truck	1			
4 Gas Meter	1			
Utility Pump	1			
Generator	1			

JOB DESCRIPTION/REMARKS

Mobilized crew and equipment to site.
Met with site contact Walter Kurzeja to determine scope of work to be performed. Conducted H and S meeting with onsite personnel.
Scope of work was to include RMT first removing the tank, and RRI crew will clean tank for removal.
Investigated tank and found volume of material (liquid and sludge) is much more than anticipated.
Conducted examination of underground tank and determined that the safest way to proceed with removing the tank would be to remove all liquids contained inside the tank prior to removal.
Used 4 Gas Meter to check air quality inside tank prior to performing any work. Air quality ok.
Crew started to remove the liquids using a utility pump and placing into 55 gallon steel drums.
Due to concerns about completing the removal and cleaning of the tank today, a discussion was held and it was decided the crew would return 2/18 to finish pumping off the liquids and to also remove and clean the tank.
Staged drums on site.
Crew collected (2) two samples for analysis.
Crew cleaned and secured site. Demob from site.

Customer Signature: _____ Representative: Joe Solt

Date: _____ Date: February 17, 2004

Original - Customer Copy

Rapid Response

RAPID RESPONSE INC. An Affiliate of EMSI
14 Brick Kiln Court, Northampton, PA 18067
Tel. (484) 275-6900 Fax (484) 275-6970
www.RRI - hazmat.com

DAILY RECORD

Project #: Tank removal-Wharton, NJ
Date: Wednesday, February 18, 2004
Customer: RMT Inc.
Customer Contact: Walter Kurzeja
Job Location: Wharton, NJ
Customer Phone: 616-633-4247

Names	Code	Start	On Site Start	On Site Finish	Finish
Joe Solt	RM	545			1545
Brian Rehrig	RT	545			1545
John Pursell	RT	545			1545

QTY.	Material Description
1	Health & Safety - Level C
2	Health & Safety - Level D
1	Floor Dry / Bag
22	17H 55 gal. Steel Drum
1	Oil Wipes - Bale
1	Poly Sheeting - roll

EQUIPMENT	QTY	EQUIPMENT	QTY	DISPOSAL / MANIFEST
Response Truck	1			
Response Trailer	1			Bill of Lading# 5370
Confined Space Kit	1			
Sawzall	1			
2" Pump	1			
Section 2" Solid Hose	1			
3/4" Sump Pump	1			
Generator	1			
4 Gas Meter	1			
Hand Tools	1			

JOB DESCRIPTION/REMARKS

Mobilized equipment and crew to site. Conducted Health & Safety meeting with all on site personnel.
Used 4 Gas Meter to check air quality inside tank prior to performing any work. Air quality ok.
Began pumping the remaining liquid using the 2" pump.
After most liquid was removed, the excavator (provided by the client) was used to pull the tank out of the ground.
Removed tank was placed on poly for staging and cleaning.
Used saw zall to cut an access hole in the side of the tank in order to do a confined space entry.
A 3/4" sump pump was used to remove the remaining liquids.
Set up confined space equipment for entry. Completed confined space entry permit and air monitoring.
An entry was performed and the solids and sludge were removed by shoveling, scraping, and wiping the entire interior surface of the tank.
All solids, including those removed and the wipes used, were placed into drums and labeled accordingly.
The tank was then rolled off the poly and the poly was cleaned and drummed along with all PPE used.
The excavator was used to lift the tank and load it onto a flatbed truck to be transported off site to a scrap metal yard.
Completed all paperwork required for transportation. Decon all tools and equipment.
Cleanup activities generated : 16 drums of flammable liquid, 2 PPE and plastic drums, 1 drum of tank bottoms, and 1 drum of soil samples.
Left (2) two empty 55 gal. drums on site as requested. To be used by RMT. Cleaned and secured site. Demob from site.

Customer Signature: _____ Representative: Joe Solt
Date: _____ Date: February 18, 2004

Original - Customer Copy

Non Hazardous Manifest/Bill Of Lading

All Correspondence and Invoices to:
Environmental Waste Minimization, Inc. (EWMI)
719 Roble Road - Suite 103
Allentown, PA 18109
Phone 610-264-8280
Fax 610-264-8580

Document # 5370

Job/Project #

THIS SECTION TO BE COMPLETED BY GENERATOR:

COMPANY NAME/ADDRESS
RMT, Inc.
3025 E. Beltline Ave.
Grand Rapids, MI 49546

IN CASE OF EMERGENCY OR SPILL CONTACT
Rapid Response

24 HOUR EMERGENCY PHONE #
877-4160-1038

QUANTITY	SIZE/TYPE	DESCRIPTION	APPROVAL CODE	WEIGHT/VOLUME
1	5000gal	Empty Steel Tank		(est.) 2500 P

I Hereby certify that the above named waste(s) are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the DOT and the EPA.

GENERATOR'S SIGNATURE

PRINT NAME

DATE

THIS SECTION TO BE COMPLETED BY HAULER / TRANSPORTER:

COMPANY NAME
Norwith Trucking

ADDRESS

PHONE NO.
( ) -

VEHICLE ID NO. | STATE: Pa.

BOX NUMBER-IN

BOX NUMBER-OUT

COMMENTS

I Hereby certify that the above described waste(s) were accepted for transportation at the producer's site for delivery to the waste facility. Both as listed hereupon.

DRIVER'S SIGNATURE

PRINT DRIVER'S NAME

DATE

THIS SECTION TO BE COMPLETED BY RECEIVER AT DISPOSAL FACILITY: (ONCE SIGNED, A COPY MUST BE FORWARDED TO EWMI AND GENERATOR)

FACILITY NAME
Einsfalts

ADDRESS
Stockertown, Pa.

PHONE NO.

COMMENTS

I hereby certify that the above described wastes were delivered to this Facility, that the Facility is authorized and permitted to receive such wastes.

AUTHORIZED SIGNATURE

PRINT NAME
DAVE CONDON

DATE

Blue Marsh Laboratories, Inc.
1605 Benjamin Franklin Highway
Douglassville, PA 19518

Invoice

DATE	INVOICE NO.
2/24/2004	40556

BILL TO
Environmental Waste Minimization, Inc. 14 Brick Kiln Court Northampton, PA 18067

P.O./PROJECT NO.	TERMS	DUE DATE	DATE SAMPLED	DATE REC'D	BML LAB NO.
	Net 30	3/25/2004	2/18/2004	2/19/04	37639

QTY	DESCRIPTION	RATE	AMOUNT
1	8 RCRA Metals (TCLP)	196.00	196.00
1	PCBs (608/8081)	87.50	87.50
1	Semivolatiles (GC/MS-625/8270C)	437.50	437.50
1	Volatiles (GC/MS-624/8260B)	175.00	175.00
1	pH	8.75	8.75
1	Reactive Cyanide & Sulfide	61.25	61.25
1	Flashpoint (ASTM D93)	35.00	35.00
	Project: LE Carpenter RUSH - 48 HR TAT Project Mgr: David Pohwat		

DJP OK
3/1/04

Please call (610) 327-8196 with any questions.
FEIN: 23-2587299

Total $1,001.00

Environmental Waste Minimization, Inc.

719 Roble Road • Suite 103 • Allentown, PA 18109
Tel. 610-264-8280 Fax 610-264-8580

CHAIN-OF-CUSTODY FORM

Generator Name: L & S Carpenter
Site Address: Wharton NJ
EPA ID#:
Contact:
Phone:
Fax:

Invoicing: EWMI
Billing Address: 14 Spruce St
Northampton PA 18067
Contact: Dan Pothier
Phone: 484-275-6913
Fax: 484-275-6918

I hereby authorize Environmental Waste Minimization, Inc. (EWMI) to process my sample(s) and/or associated paperwork. My company will be invoiced $_____ for the sample(s) and profiles submitted below. This includes the technical review, finger print analysis, and administrative process. Approval fee is $250 per sample and/or profile submitted.

	Sample ID Number	DATE	TIME	COMP.	GRAB	Sample Description	# of cont.	Analysis or Approvals Testing	$ Amount
1		4/18/04	1 00 pm		X	Tank Bottoms/Sludge Solids (A)	1	TCLP Metals (Solid phase only)	
2		4/18/04	1 00 pm		X	Liquid From Tank (B)	1	VOA, Semi VOA, PCB's pH, Flashpoint, Reactivity	
3									
4									
5						48-72 Hours			
6									

Transfer #	Relinquished By	Accepted By	Date	Time
1st	Email	[illegible]	4/19/04	9:30 Am
2nd				
3rd				
4th				

Total to be Invoiced →

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Land Recycling and Waste Management
P.O. Box 8550
Harrisburg, PA 17105-8550

Form approved.

OFFICIAL PENNSYLVANIA MANIFEST FORM

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NJD002168748 | Manifest Document No. 37110

2. Page 1 of 1 | Information within the bold red border is not required by Federal law but may be required by State law.

3. Generator's Name and Mailing Address: L.E. Carpenter Company, 170 N. Main St., Wharton, NJ 07885

4. Generator's Phone (973) 366-1056

A. State Manifest Document Number: PAH 037110

B. State Gen. ID: SAME

5. Transporter 1 Company Name: Environmental Waste Minimization | 6. US EPA ID Number: PAR000501577

C. State Trans. ID: PA-AH (Cad NJ) DEP30018

7. Transporter 2 Company Name | 8. US EPA ID Number

D. Transporter's Phone (484) 275-6900

9. Designated Facility Name and Site Address: Republic Environmental Systems Inc., 2869 Sandstone Dr., Hatfield, PA 19440 | 10. US EPA ID Number: PAD085690592

E. State Trans. ID: PA-AH

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone (215) 822-2071

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X Waste Flammable Solids, organic, n.o.s., 4.1, UN1325, PG-II (Xylene) (D001)	XXX	DM	XX300	P	D001
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above: 11a. LP-1 S.

K. Handling Codes for Wastes Listed Above: a. | c. | b. | d.

15. Special Handling Instructions and Additional Information

Emergency Phone: 973 366-1050
or
888-460-1038
T-102 RLP-1496

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
DAVE CONDON	Dave Condon	3	23	04

17. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Scott Strongowsk	Scott Strongowsk	03	23	04

Printed/Typed Name	Signature	Month	Day	Year

18. Discrepancy Indication Space

Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 18.

Printed/Typed Name	Signature	Month	Day	Year
DEAN A Vise		03	26	04

GENERATOR — TRANSPORTER — FACILITY

PAH 037110

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete

5

PSC
PHILIP SERVICES

LAND DISPOSAL RESTRICTION NOTIFICATION CERTIFICATION FORM

Generator Name: L.E. Carpenter & Company Generator EPA ID Number: NJD002168748

Manifest Number: 24H 63710

The purpose of this form is to provide appropriate notification/certification, in accordance with the Land Disposal Restriction regulations set forth in 40 CFR Part 268, to the treatment, storage or disposal facility which receives the wastes referenced below. In accordance with the waste analysis and recordkeeping requirements specified in 40 CFR 268.7, I have indicated below the relevant information required to properly manage my waste(s) in compliance with the Land Disposal Restriction treatment standards found in 40 CFR Part 268.

Approval/Lab Code	Manifest Line # (see Item 19b)	W W	N W W	List the EPA Waste Codes, Subcategories and/or Constituent(s) of Concern (these may also be identified by attaching a UHC Table Form)*	UHCs* (Y or N)	Classification Group
LP-1	1a		X	D001	N	A

W.W. - Wastewater N.W.W. - Non-Wastewater

* The Underlying Hazardous Constituents (UHCs) must be identified for characteristic waste streams, EPA Waste Codes D001-D043, if the wastes are treated in non-CWA, non-CWA equivalent or non-SDWA facilities. Please complete and attach an Underlying Hazardous Constituents (UHC) Table sheet (photocopy as necessary) for each affected Approval/Lab Code. The UHC Table sheet may also be used to identify constituents of concern for F001-F005 and F039 wastes.

Classification Groups

A. Restricted wastes which require treatment.
B. Restricted wastes already treated to meet LDR Treatment Standards.
C. Characteristic wastes already treated to meet Universal Treatment Standards (UTS) including underlying hazardous constituents (UHCs).
D. Restricted wastes that meet LDR Treatment Standards without prior treatment.
E. Restricted wastes subject to an Exemption or Variance. This waste is not prohibited from land disposal until _____ (date).
F. Hazardous debris subject to Alternative Treatment Standards in 40 CFR 268.45 (List Contaminants).
G. Hazardous debris subject to Treatment Standards in 40 CFR 268.40.
H. Lab Pack wastes subject to Alternative Treatment Standards under 40 CFR 268.42(c)
I. Wastes already treated to remove hazardous characteristic(s) but require further treatment for underlying hazardous constituents (list constituents).
J. Contaminated Soils that *do not meet* treatment standards
   1. This contaminated soil does contain listed waste and does exhibit a characteristic of hazardous waste and is subject to the soil treatment standards as provided by §268.49(c) or the UTS.
   2. This contaminated soil does contain listed waste and does not exhibit a characteristic of hazardous waste and is subject to the soil treatment standards as provided by §268.49(c) or the UTS.
   3. This contaminated soil does not contain listed waste and does exhibit a characteristic of hazardous waste and is subject to the soil treatment standards as provided by §268.49(c) or the UTS.
K. Contaminated Soils that *meet* treatment standards
   1. This contaminated soil does contain listed waste and does not exhibit a characteristic of hazardous waste and complies with the soil treatment standards as provided by §268.49(c) or the UTS.
   2. This contaminated soil does not contain listed waste and does not exhibit a characteristic of hazardous waste and complies with the soil treatment standards as provided by §268.49(c) or the UTS.

The applicable certification statements corresponding to the Classification Groups identified above are as follows:

Classification Group B: "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR 268.40 without impermissible dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

Classification Group C: "I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic and that underlying hazardous constituents, as defined in §268.2(i), have been treated on-site to meet the §268.48 Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

Classification Group D: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

Classification Group H: "I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only wastes which have not been excluded under appendix IV to 40 CFR part 268 and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR §268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

Classification Group I: "I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet universal treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment."

Classification Group K1, K2 "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited wastes. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Signature: Dave Carter Title: _____ Date: 5/23/04

RECEIVED FEB 2 6 2004

Douglassville Location:
5 Benjamin Franklin Highway
Douglassville, PA 19518
Phone: (610) 327-8196
Fax: (610) 327-6864

NJ DEP Cert #PA925
PA DEP Cert #06-409

Blue Marsh
LABORATORIES • INC

Professional testing for the critical decision

Princeton Location:
267 Wall Street
Princeton, NJ 08540
Phone: (609) 924-5151
Fax: (609) 924-9692

NJ DEP Cert #11198

- CERTIFICATE OF ANALYSIS -

LAB #: 37639-1

Client: Environmental Waste Minimization Inc.
14 Brick Kiln Court
Northampton, PA 18067

Attn: David Pohwat

Project: LE Carpenter

Received: 2/19/04

Sample Type: Sludge
Sample ID: Tank Bottoms/ Sludge Solids (A)

Collected By: Client
Collected: February 18, 2004

Source:

Report Date: February 23, 2004

Abstract Test	Result	Units	PQL	Method	Init	Analysis Date
Met-6010B-TCLP						
Arsenic - TCLP	< 0.005	mg/L	0.005	6010B	KJP-DV	2/20/04 12:07
Barium - TCLP	0.184	mg/L	0.005	6010B	KJP-DV	2/20/04 12:07
Cadmium - TCLP	< 0.005	mg/L	0.005	6010B	KJP-DV	2/20/04 12:07
Chromium - TCLP	0.051	mg/L	0.005	6010B	KJP-DV	2/20/04 12:07
Lead - TCLP	0.081	mg/L	0.005	6010B	KJP-DV	2/20/04 12:07
Selenium - TCLP	< 0.005	mg/L	0.005	6010B	KJP-DV	2/20/04 12:07
Silver - TCLP	< 0.005	mg/L	0.005	6010B	KJP-DV	2/20/04 12:07
Met-7471A-TCLP						
Mercury - TCLP	< 0.0002	mg/L	0.0002	7471A	KJP-DV	2/20/04 13:52
TCLP Extraction						
TCLP Extraction - TCLP	DONE			1311	KJP-DV	2/20/04 8:30

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Princeton, NJ 08540
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Fax: (609) 924-9692

NJ DEP Cert #11198

- CERTIFICATE OF ANALYSIS -

LAB #: 37639-2

Client: Environmental Waste Minimization Inc.
14 Brick Kiln Court
Northampton, PA 18067

Attn: David Pohwat

Project: LE Carpenter

Received: 2/19/04

Sample Type: Sludge
Sample ID: Liquid From Tank (B)

Collected By: Client
Collected: February 18, 2004

Source:

Report Date: February 23, 2004

Abstract Test	Result	Units	PQL	Method	Init	Analysis Date
Flashpoint						
Ignitability	94.	F	1	SW846	DJC-DV	2/23/04 13:15
PCB-8082-sd						
Aroclor-1016	< 200.	ug/kg	200	8082	SMS-DV	2/20/04 17:56
Aroclor-1221	< 200.	ug/kg	200	8082	SMS-DV	2/20/04 17:56
Aroclor-1232	< 200.	ug/kg	200	8082	SMS-DV	2/20/04 17:56
Aroclor-1242	< 200.	ug/kg	200	8082	SMS-DV	2/20/04 17:56
Aroclor-1248	< 200.	ug/kg	200	8082	SMS-DV	2/20/04 17:56
Aroclor-1254	< 200.	ug/kg	200	8082	SMS-DV	2/20/04 17:56
Aroclor-1260	< 200.	ug/kg	200	8082	SMS-DV	2/20/04 17:56
SVol-8270C-sd						
1,2-Diphenylhydrazine	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2,3,4,6-Tetrachlorophenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2,4,5-Trichlorophenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2,4,6-Trichlorophenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2,4-Dichlorophenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2,4-Dimethylphenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2,4-Dinitrophenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2,4-Dinitrotoluene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2,6-Dichlorophenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2,6-Dinitrotoluene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2-Chloronaphthalene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2-Chlorophenol	533010.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2-Methylnaphthalene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2-Methylphenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2-Nitroaniline	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
2-Nitrophenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
3,3-Dichlorobenzidine	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
3-Nitroaniline	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
4,6-Dinitro-2-methylphenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
4-Bromophenyl phenyl ether	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21

Douglassville Location:
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Douglassville, PA 19518
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PA DEP Cert #06-409

Blue Marsh
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Professional testing for the critical decision

Princeton Location:
267 Wall Street
Princeton, NJ 08540
Phone: (609) 924-5151
Fax: (609) 924-9692

NJ DEP Cert #11198

- CERTIFICATE OF ANALYSIS -

LAB #: 37639-2

Client: Environmental Waste Minimization Inc.
14 Brick Kiln Court
Northampton, PA 18067

Attn: David Pohwat

Project: LE Carpenter

Received: 2/19/04

Sample Type: Sludge
Sample ID: Liquid From Tank (B)

Collected By: Client
Collected: February 18, 2004

Source:

Report Date: February 23, 2004

Abbrevd Test	Result	Units	PQL	Method	Init	Analysis Date
4-Chloro-3-methylphenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
4-Chloroaniline	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
4-Chlorophenyl phenyl ether	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
4-Methylphenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
4-Nitroaniline	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
4-Nitrophenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Acenaphthene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Acenaphthylene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Anthracene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Benz(a)anthracene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Benzo(a)pyrene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Benzo(b)fluoranthene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Benzo(g,h,i)perylene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Benzo(k)fluoranthene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Benzoic acid	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Benzyl alcohol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Bis(2-chloroethoxy)methane	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Bis(2-chloroethyl) ether	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Bis(2-chloroisopropyl) ether	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Bis(2-ethylhexyl) phthalate	83265.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Butyl benzyl phthalate	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Carbazole	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Chrysene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Di-n-butyl phthalate	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Di-n-octyl phthalate	5425.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Dibenz(a,h)anthracene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Dibenzofuran	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Diethylphthalate	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Dimethyl phthalate	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Fluoranthene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Fluorene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Hexachlorobenzene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Hexachlorobutadiene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21

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NJ DEP Cert #11198

- CERTIFICATE OF ANALYSIS -

LAB #: 37639-2

Client: Environmental Waste Minimization Inc.
14 Brick Kiln Court
Northampton, PA 18067

Attn: David Pohwat

Project: LE Carpenter

Received: 2/19/04

Sample Type: Sludge
Sample ID: Liquid From Tank (B)

Collected By: Client
Collected: February 18, 2004

Source:

Report Date: February 23, 2004

Abstract Test	Result	Units	PQL	Method	Init	Analysis Date
Hexachlorocyclopentadiene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Hexachloroethane	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Indeno(1,2,3-cd)pyrene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Isophorone	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
N-Nitroso-di-n-propylamine	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
N-Nitrosodimethylamine	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
N-Nitrosodiphenylamine	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Nitrobenzene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Pentachlorophenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Phenanthrene	1060.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Phenol	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Pyrene	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Pyridine	< 500.	ug/kg	500	8270C	SMS-DV	2/20/04 15:21
Vol-8260B-sd						
1,1,1,2-Tetrachloroethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,1,1-Trichloroethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,1,2,2-Tetrachloroethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,1,2-Trichloroethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,1-Dichloroethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,1-Dichloroethene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,1-Dichloropropanone	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,1-Dichloropropene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,2,3-Trichlorobenzene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,2,3-Trichloropropane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,2,4-Trichlorobenzene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,2,4-Trimethylbenzene	90862.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,2-Dibromo-3-chloropropane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,2-Dibromoethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,2-Dichlorobenzene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,2-Dichloroethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,2-Dichloropropane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,3,5-Trimethylbenzene	44612.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,3-Dichlorobenzene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50

Douglassville Location:
605 Benjamin Franklin Highway
Douglassville, PA 19518
Phone: (610) 327-8196
Fax: (610) 327-6864

NJ DEP Cert #PA925
PA DEP Cert #06-409

Blue Marsh
LABORATORIES • INC
Professional testing for the critical decision

Princeton Location:
267 Wall Street
Princeton, NJ 08540
Phone: (609) 924-5151
Fax: (609) 924-9692

NJ DEP Cert #11198

- CERTIFICATE OF ANALYSIS -

LAB #: 37639-2

Client: Environmental Waste Minimization Inc.
14 Brick Kiln Court
Northampton, PA 18067

Sample Type: Sludge
Sample ID: Liquid From Tank (B)

Attn: David Pohwat

Collected By: Client
Collected: February 18, 2004

Project: LE Carpenter

Source:

Received: 2/19/04

Report Date: February 23, 2004

Analyte / Test	Result	Units	PQL	Method	Init	Analysis Date
1,3-Dichloropropane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1,4-Dichlorobenzene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
1-Chlorobutane	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
2,2-Dichloropropane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
2-Butanone	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
2-Chlorotoluene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
2-Hexanone	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Nitropropane	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
4-Chlorotoluene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
4-Isopropyltoluene	4215.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
4-Methyl-2-pentanone	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Acetone	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Acrylonitrile	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Allyl chloride	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Benzene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Bromobenzene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Bromochloromethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Bromodichloromethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Bromoform	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Bromomethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Carbon disulfide	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Carbon tetrachloride	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Chloroacetonitrile	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Chlorobenzene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Chloroethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Chloroform	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Chloromethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
cis-1,2-Dichloroethene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
cis-1,3-Dichloropropene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Dibromochloromethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Dibromomethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Dichlorodifluoromethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Dichloromethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50

Douglassville Location:
105 Benjamin Franklin Highway
Douglassville, PA 19518
Phone: (610) 327-8196
Fax: (610) 327-6864

NJ DEP Cert #PA925
PA DEP Cert #06-409

Blue Marsh
LABORATORIES • INC

Professional testing for the critical decision

Princeton Location:
267 Wall Street
Princeton, NJ 08540
Phone: (609) 924-5151
Fax: (609) 924-9692

NJ DEP Cert #11198

- CERTIFICATE OF ANALYSIS -

LAB #: 37639-2

Client: Environmental Waste Minimization Inc.
14 Brick Kiln Court
Northampton, PA 18067

Attn: David Pohwat

Project: LE Carpenter

Received: 2/19/04

Sample Type: Sludge
Sample ID: Liquid From Tank (B)
Collected By: Client
Collected: February 18, 2004
Source:
Report Date: February 23, 2004

Abstract Test	Result	Units	PQL	Method	Init	Analysis Date
Diethyl ether	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Ethyl benzene	7161.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Ethyl methacrylate	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Hexachlorobutadiene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Hexachloroethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Isopropylbenzene	4050.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Methacrylonitrile	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Methyl iodide	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Methyl tert-butyl ether	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Methylacrylate	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Methylmethacrylate	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
n-Butylbenzene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
n-Propylbenzene	8537.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Naphthalene	16066.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Nitrobenzene	16550.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Pentachloroethane	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Propionitrile	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
sec-Butylbenzene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Styrene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
t-Butyl alcohol	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
tert-Butylbenzene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Tetrachloroethene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Tetrahydrofuran	< 9690.	ug/kg	9690	8260B	MJM-DV	2/20/04 12:50
Toluene	2364.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
trans-1,2-Dichloroethene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
trans-1,3-Dichloropropene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
trans-1,4-Dichloro-2-butene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Trichloroethene	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Trichlorofluoromethane	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Vinyl chloride	< 969.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
Xylenes (Total)	118760.	ug/kg	969	8260B	MJM-DV	2/20/04 12:50
WC-9045C-sd						
pH	3.	s.u.	0.01	9045C	DJC-DV	2/23/04 13:15

Douglassville Location:
1405 Benjamin Franklin Highway
Douglassville, PA 19518
Phone: (610) 327-8196
Fax: (610) 327-6864

NJ DEP Cert #PA925
PA DEP Cert #06-409

Blue Marsh
LABORATORIES • INC

Professional testing for the critical decision

Princeton Location:
267 Wall Street
Princeton, NJ 08540
Phone: (609) 924-5151
Fax: (609) 924-9692

NJ DEP Cert #11198

- CERTIFICATE OF ANALYSIS -

LAB #: 37639-2

Client: Environmental Waste Minimization Inc.
14 Brick Kiln Court
Northampton, PA 18067

Attn: David Pohwat

Project: LE Carpenter

Received: 2/19/04

Sample Type: Sludge
Sample ID: Liquid From Tank (B)
Collected By: Client
Collected: February 18, 2004
Source:
Report Date: February 23, 2004

Abstract Test	Result	Units	PQL	Method	Init	Analysis Date
WC-SW846CN-sd						
Cyanide,reactive	< 0.01	mg/kg	0.01	SW846	DW-DV	2/23/04 10:45
WC-SW846S-sd						
Sulfide, reactive	< 1.	mg/kg	1	SW-846	DW-DV	2/23/04 12:15

Reviewed and Approved by;

Debbie Wanner
Laboratory Manager

DEQ

WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE
ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Part 111 and Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to criminal and/or civil penalties under Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No. 77231	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address			
4. Generator's Phone ( )			
5. Transporter 1 Company Name	6. US EPA ID Number		
7. Transporter 2 Company Name	8. US EPA ID Number		
9. Designated Facility Name and Site Address	10. US EPA ID Number		
		11. Facility Phone	

	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.	
a.	x18	DM	XX990	G	D 0 0 6 0 3 2
b.					
c.					
d.					

GENERATOR

15. Additional Descriptions for Materials Listed Above

16. Special Handling Instructions and Additional Information

973-366-1050

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Date Month Day Year
DAVE LOWDON	Dave Lowdon	03 12 04

TRANSPORTER

17. Transporter 1 Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year
Raymond S Beer	Raymond S Beer	03 13 04

18. Transporter 2 Acknowledgment of Receipt of Materials

Printed/Typed Name	Signature	Date Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date Month Day Year

EPA Form 8700-22 (Rev. 9/88)

To be mailed by Generator to: WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
PO BOX 30038

SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOUR PER DAY.

Land Disposal Restriction & Certification Form

Please check the appropriate facility:

☐ Michigan Disposal Waste Treatment Plant	49350 N. I-94 Service Drive, Belleville, MI 481 11	EPA ID # MID 000 724 831
☐ Wayne Disposal, Inc. Site #2 Landfill	49350 N. I-94 Service Drive, Belleville, MI 481 11	EPA ID # MID 048 090 633
☐ EQ Detroit, Inc.	1923 Frederick Street, Detroit, MI 4821 1	EPA ID # MID 980 991 566
☒ EQ Resource Recovery, Inc.	36345 Van Born Road, Romulus, MI 48174	EPA ID # MID 060 975 844
☐ EQ North Carolina	1005 Investment Blvd, Apex, NC 27502	EPA ID # NCD 982 170 292
☐ EQ Florida, Inc.	7202 East 8th Ave, Tampa, Fl, 33619	EPA ID # FLD 981 932 494

Generator Name: L.E. Carpenter & Company U.S. EPA ID No.: NJD002168748

Generator Address: 170 N. Main St., Wharton, NJ 07885

State Manifest No.: MI9411639 Manifest Doc. No.: 11639

Instructions

Column 1: Identify all U.S. EPA hazardous waste codes that apply to this waste shipment.
Column 2: Choose the appropriate treatability group: Non-Wastewater (NWW) or Wastewater (WW).
Column 3: Enter the appropriate Subcategory, if applicable, and also enter "Contaminated Soil" or "Debris" if the waste will be treated using one of the alternative treatment technologies provided by 268.49 (c) - soil, or 268.45 - debris.
Column 4: Enter the letter of the appropriate paragraph from pages 1-2 of this form.
Column 5: For F001 - F005, F039, D001 - D043, Debris and Contaminated Soil: please enter the Reference Number(s) for any constituents in your waste stream subject to treatment. The Reference Number(s) can be found in the EQ Resource Guide, LDR/UHC Constituent Table.

Manifest Line Item	U.S. EPA Hazardous Waste Code (s)	NWW or WW	Subcategory	How Must the Waste be Managed?	Reference Number(s) of Hazardous Constituents contained in the waste. Complete for F001-F005, F039, D001-D043, Soil and Debris wastes.
11 A	D001, D036	NWW	High TOC	A	141 145 199
11 B					
11 C					
11 D					

I hereby certify that all information submitted on this and all associated documents is complete and accurate to the best of my knowledge and information.

Generator Signature: Dave Condon Title:

Printed Name: DAVE CONDON Date: 3/23/04

How Must the Waste Be Managed?

S. THIS CONTAMINATED SOIL *DOES* *DOES NOT* CONTAIN LISTED HAZARDOUS WASTE AND *DOES* *DOES NOT* EXHIBIT A
(CIRCLE ONE) (CIRCLE ONE)
CHARACTERISTIC OF HAZARDOUS WASTE AND IS *IS SUBJECT TO* *COMPLIES WITH* THE SOIL TREATMENT STANDARDS
(CIRCLE ONE)
AS PROVIDED BY 268.49(c) OR THE UNIVERSAL TREATMENT STANDARDS. I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited wastes. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

PETROLEUM RELEASE RESPONSE DOCUMENTATION

RAPID RESPONSE, INC. An Affiliate of EWMI

Rapid Response

14 Brick Kiln Court, Northampton, PA 18067
Tel. (484) 275-6900 Fax (484) 275-6970
www.RRI - hazmat.com

DAILY RECORD

Project #: Ground Contamination Control
Date: Friday May 21, 2004
Customer: R.M.T. Inc. / LE Carpenter & Co.
Customer Contact: Nick Clevett
Job Location: 170 N. Main St., Wharton, NJ. 07885
Customer Phone: 616-780-2398

Names	Code	Start	On Site Start	On Site Finish	Finish
S. Nothstein	RM	1500			2200
C. Sodroski	RT	1500			2200
M. Albury	RT	1500			2200

QTY.	Material Description
3	Health & Safety Level D
4	8" Oil Booms / Bale
1	Oil Sweeps / Bale

EQUIPMENT	QTY	EQUIPMENT	QTY	DISPOSAL / MANIFEST
Response Truck	2			
Digital Camera	1			

JOB DESCRIPTION/REMARKS

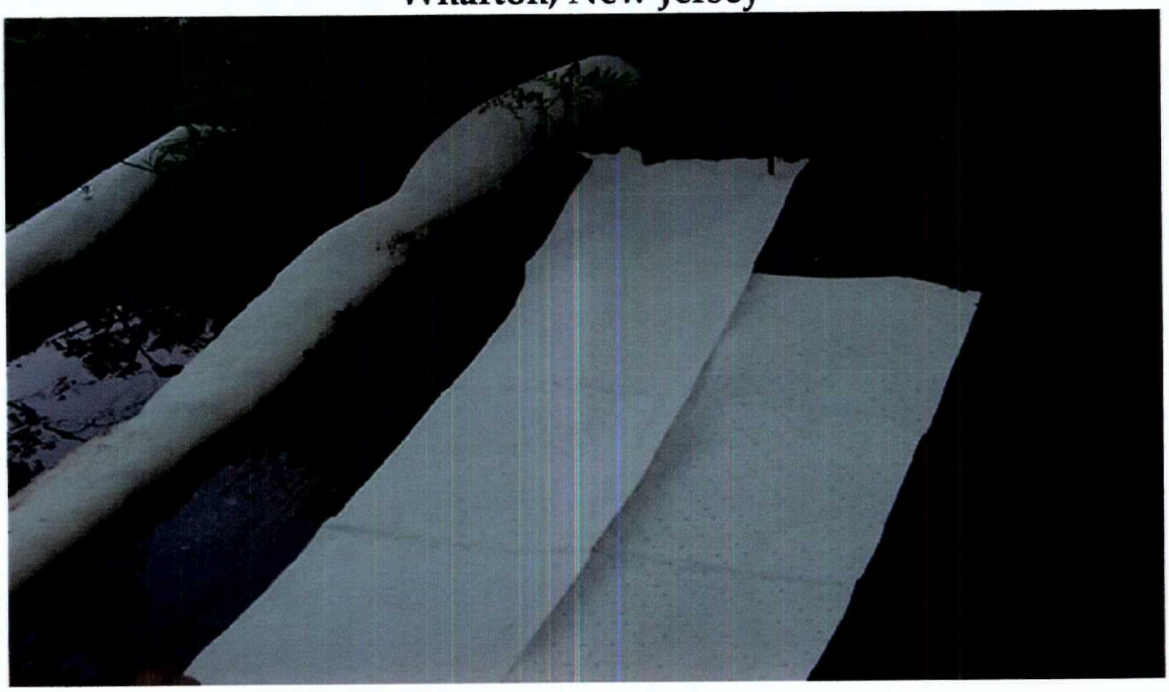
Mobilized crew and equipment to site. Conducted health and safety meeting with on-site personnel.
Met with on site representative Dave Condon to provide access to the site.
Crew walked site to investigate areas identified on supplied map.
Surveyed areas for proper location and boom configuration.
Crew installed (2) two rows of 8" oil booms and (1) one row of oil sweeps in the mouth of the seep area. Booms and sweeps were anchored using 12" pieces of rebar.
Crew placed (2) two rows of 8" oil booms and (1) one row of oil sweeps in the upper end of the ditch.
Used the same boom configuration in the identified lower section of the ditch
One end of the booms and sweeps were anchored to a chain link fence while the other end was anchored using 12" pieces of rebar.
Photographed site activities.
Crew cleaned and secured site. Demobilized from scene.

RRI communicated site activities to RMT representative Karl Delooff on 5/21/04. E-mailed photos for review.

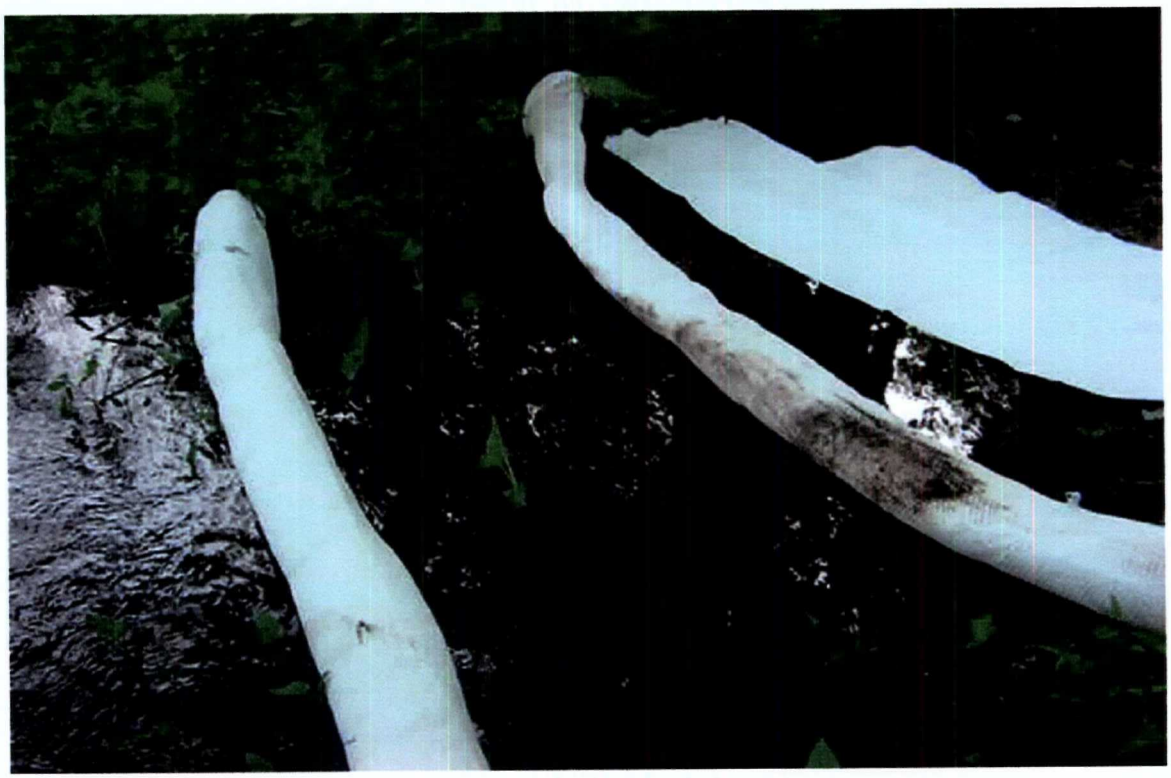
Customer Signature: _____ Representative: Scott Nothstein
Date: _____ Date: May 24, 2004

Original - Customer Copy

L.E. Carpenter –
Wharton, New Jersey



Oil sweeps and booms at the intersection of the river seep sheen drainage pathway and the Rockaway River (No. 1)



Oil sweeps and booms at the intersection of the river seep sheen drainage pathway and the Rockaway River (No. 2)

L.E. Carpenter –
Wharton, New Jersey

Oil sweeps and booms in the drainage channel that separates the Air Product property and LEC. Absorbent materials located in the ditch water directly east of the ditch seep along the western bank of the ditch.

Rapid Response

RAPID RESPONSE, INC. An Affiliate of EWMI
14 Brick Kiln Court, Northampton, PA 18067
Tel. (484) 275-6900 Fax (484) 275-6970
www.RRI - hazmat.com

DAILY RECORD

Project #: Ground Contamination Control
Date: Friday, June 4, 2004
Customer: RMT Inc. / LE Carpenter & Co.
Customer Contact: Nick Clevett
Job Location: 170 N. Main St., Wharton, NJ. 07885
Customer Phone: 616-780-2398

Names	Code	Start	On Site Start	On Site Finish	Finish
M. Ebbert	RM	0830			1300
S. Nothstein	RT	0830			1300

QTY.	Material Description
2	Health & Safety Level D
1	8" Oil Booms / bale
1	Oil Sweeps / Bale
1	55 Gallon Steel Drum

EQUIPMENT	QTY	EQUIPMENT	QTY
Response Truck	1		
Digital Camera	1		

DISPOSAL / MANIFEST

JOB DESCRIPTION/REMARKS

Mobilized crew and equipment to site. Conducted health and safety meeting with on-site personnel.
Crew met with on site representative Dave Condon to unlock the fence surrounding the premises.
Crew replaced (2) two rows of 8" oil booms and (2) two rows of oil sweeps in the mouth of the seep area.
RRI crew was unable to enter premises where the (2) two other containment areas were located.
Visible product seen in collection area in the mouth of the seep area.
Contaminated booms and sweeps were bagged and placed into a 55 gallon steel drum.
Cleanup activities generated 1 drum for disposal.
Labeled and staged drum on-site.
Staged additional empty drums on site for future containerization of collected contaminated materials.
Photographed site activities.
Crew cleaned and secured site. Demobilized from scene.

Customer Signature: _____ Representative: Mark Ebbert
Date: _____ Date: June 04, 2004

Original - Customer Copy

RAPID RESPONSE INC.
14 Brick Kiln Court, Northampton, PA 18067
Tel. (484) 275-6900 Fax (484) 275-6970
www.RRI - hazmat.com

DAILY RECORD

Project #: Ground Contamination Control
Date: Wednesday June 16, 2004
Customer: RMT Inc. / LE Carpenter & Co.
Customer Contact: Nick Clevett
Job Location: 170 N. Main St., Wharton, NJ 07885
Customer Phone: 616-780-2398

Names	Code	Start	On Site Start	On Site Finish	Finish
cott Nothstein	RM	0900			1400

QTY.	Material Description
1	Health & Safety Level D
1	8" Oil Boom / Bale
1	Oil Sweeps / Bale
1	55 Gallon Steel 17H Drums

EQUIPMENT	QTY	EQUIPMENT	QTY	DISPOSAL / MANIFEST
Response Truck	1			
Digital Camera	1			

JOB DESCRIPTION/REMARKS

Mobilized crew and equipment to site. Conducted health and safety meeting with on-site personnel.
Met with on site representative Dave Condon to unlock the fence surrounding the premises.
Crew flipped (2) two rows of 8" oil booms and replaced (1) one row of oil sweeps.
Crew added an additional 8" oil boom to the mouth of the seep area.
Seep area was fairly dry with no running water.
Visible product seen in collection area in the mouth of the seep area.
RRI crew was unable to enter premises where the (2) two other containment areas were located.
Contaminated sweeps were bagged and placed into a 55 gallon steel drum.
Photographed site activities.
Crew cleaned and secured site. Demobilized from scene.

Customer Signature: _____ Representative: Scott Nothstein
Date: _____ Date: June 16, 2004

Original - Customer Copy

RAPID RESPONSE Inc.
An Allwaste Event
14 Brick Kiln Court, Northampton, PA 18067
Tel. (484) 275-6900 Fax (484) 275-6970
www.RRI - hazmat.com

DAILY RECORD

Project #: Ground Contamination Control
Date: Tuesday, June 29, 2004
Customer: RMT Inc. / LE Carpenter & Co.
Customer Contact: Nick Clevett
Job Location: 170 N. Main St., Wharton, NJ. 07885
Customer Phone: 616-780-2398

Names	Code	Start	On Site Start	On Site Finish	Finish
M. Ebbert	RM	0815			1215
B. Rehrig	RT	0815			1215

QTY.	Material Description
2	Health & Safety Level D
1	8" Oil Booms / bale
1	Oil Sweeps / Bale
1	55 Gallon Steel Drum

EQUIPMENT	QTY	EQUIPMENT	QTY	DISPOSAL / MANIFEST
Response Truck	1			
Digital Camera	1			

JOB DESCRIPTION/REMARKS

Mobilized equipment and crew to site. Conducted Health and Safety meeting with all on-site personnel.
Met with on-site representative Dave Condon to unlock the fence surrounding the premises.
Crew replaced three (3) rows of 8" oil booms and one (1) row of oil sweeps in the mouth of the seep area.
RRI's crew was unable to enter premises where the two (2) other containment areas were located.
Visible ground contamination seen in collection area in the mouth of the seep area.
Seep area was fairly dry with no running water.
Contaminated booms and sweeps were bagged and placed into a 55 gallon steel drum for disposal.
Clean up activities generated one (1) drum for disposal.
Labeled and staged drum on -site.
Photographed site activities.
Clean and secure site.

RRI communicated site activities and email site photos to RMT representative Nicholas Clevett on 6-29-04

Customer Signature: _____ Representative: Mark A. Ebbert
Date: _____ Date: June 29, 2004

Original - Customer Copy

RAPID RESPONSE INC.
An Affiliate of EWMI
14 Brick Kiln Court, Northampton, PA 18067
Tel. (484) 275-6900 Fax (484) 275-6970
www.RRI - hazmat.com

DAILY RECORD

Project #: Ground Contamination Control
Date: Thursday, July 15, 2004
Customer: RMT Inc. / LE Carpenter & Co.
Customer Contact: Nick Clevett
Job Location: 170 N. Main St., Wharton, NJ. 07885
Customer Phone: 616-780-2398

Names	Code	Start	On Site Start	On Site Finish	Finish
M. Ebbert	RM	0800			1300
S. Nothstein	RT	0800			1300

QTY.	Material Description
2	Health & Safety Level D
4	8" Oil Booms / bales
1	Oil Sweeps / Bale
5	55 Gallon Steel Drums

EQUIPMENT	QTY	EQUIPMENT	QTY	DISPOSAL / MANIFEST
Response Truck	1			
Digital Camera	1			

JOB DESCRIPTION/REMARKS

RRI was advised by customer contact Nick Clevett that the access agreement has been approved to enter the Air Products Property.
Customer contact coordinated with Air Products representative Janet Sanders to meet RRI's crew on site to gain access to the Air Products property to exchange the booms and sweeps in the ditch area.
Mobilized equipment and crew to site. Conducted Health and Safety meeting with all on-site personnel.
Met with Air Products representative Janet Sanders to review scope of work.
Crew replaced four (4) rows of 8" oil booms and two (2) rows of oil sweeps in two (2) separate locations in the ditch area.
A very light sheen was seen on the surface of the water.
Crew then mobilized to the LE Carpenter / Wharton property.
Met with on-site representative Dave Condon to unlock the fence surrounding the premises.
Crew flipped two (2) rows of 8" oil booms and replaced one (1) row of 8" oil booms and one (1) row of oil sweeps in the mouth of the seep area.
Visible ground contamination seen in collection area in the mouth of the seep area.
Due to recent heavy rains, seep area contained standing water. Observed no current or flow toward river.
Contaminated booms and sweeps were bagged and placed into 55 gallon steel drums for disposal. Clean up activities generated five (5) drums for disposal.
Labeled and staged drums on the LE Carpenter / Wharton property. Photographed site activities. Clean and secure site.
RRI communicated site activities and email site photos to RMT representative Nicholas Clevett on 7-16-04

Customer Signature: _____ Representative: Mark A. Ebbert
Date: _____ Date: July 16, 2004

Original - Customer Copy

RAPID RESPONSE INC.
An Affiliate of EWMI
14 Brick Kiln Court, Northampton, PA 18067
Tel. (484) 275-6900 Fax (484) 275-6970
www.RRI - hazmat.com

DAILY RECORD

Project #: Ground Contamination Control
Customer: RMT Inc. / LE Carpenter & Co.
Job Location: 170 N. Main St., Wharton, NJ. 07885

Date: Wednesday, July 28, 2004
Customer Contact: Nick Clevett
Customer Phone: 616-780-2398

Names	Code	Start	On Site Start	On Site Finish	Finish
M. Ebbert	RM	0800			1300
B. Michalik	RT	0800			1300

QTY.	Material Description
2	Health & Safety Level D
1	8" Oil Booms / bale
1	Oil Sweeps / Bale
	Heavy Mil Garbage Bags

EQUIPMENT	QTY	EQUIPMENT	QTY	DISPOSAL / MANIFES
Response Truck	1			
Digital Camera	1			

JOB DESCRIPTION/REMARKS

Mobilized equipment and crew to site. Conducted Health and Safety meeting with all on-site personnel.
Met with Air Products representative Janet Sanders to unlock the fence surrounding the premises.
Crew flipped all 8" oil booms and replaced two (2) rows of oil sweeps in two (2) separate locations in the ditch area.
A very light sheen was seen on the surface of the water.
Crew then mobilized to the LE Carpenter / Wharton property.
Met with on-site representative Dave Condon to unlock the fence surrounding the premises.
Crew flipped one (1) row of 8" oil booms and replaced two (2) rows 8" oil booms and one (1) row of oil sweeps in the mouth of the seep area.
Visible ground contamination seen in collection area in the mouth of the seep area.
Due to recent heavy rains, seep area contained standing water. Observed no current or flow toward river.
Contaminated booms and sweeps were bagged and placed into 55 gallon steel drums for disposal. Clean up activities generated one (1) drum for dispo
Labeled and staged drum on the LE Carpenter / Wharton property..
Photographed site activities.
Clean and secured site.

RRI communicated site activities and email site photos to RMT representative Nicholas Clevett on 7-29-04

Customer Signature: _____ Representative: Mark A. Ebbert
Date: _____ Date: July 29, 2004

Original - Customer Copy

RAPID RESPONSE, Inc.
An Affiliate of EWMI
14 Brick Kiln Court, Northampton, PA 18067
Tel. (484) 275-6900 Fax (484) 275-6970
www.RRI - hazmat.com

DAILY RECORD

Project #: Ground Contamination Control
Date: Wednesday, August 11, 2004
Customer: RMT Inc. / LE Carpenter & Co.
Customer Contact: Nick Clevett
Job Location: 170 N. Main St., Wharton, NJ 07885
Customer Phone: 616-780-2398

Names	Code	Start	On Site Start	On Site Finish	Finish
S. Nothstein	RM	0800			1300
B. Rehrig	RT	0800			1300

QTY.	Material Description
2	Health & Safety Level D
3	8" Oil Booms / Bales
1	Oil Sweeps / Bales
	Heavy Mill Garbage Bags
6	55 Gallon Steel 17H Drums

EQUIPMENT	QTY	EQUIPMENT	QTY	DISPOSAL / MANIFEST
Response Truck	1			
Digital Camera	1			

JOB DESCRIPTION/REMARKS

Mobilized equipment and crew to site. Conducted Health and Safety meeting with all on-site personnel.
Air Products representative Janet Sanders supplied RRI with a key to access their property for the routine maintenance events.
Air Products Property: Crew replaced all 8" oil booms and replaced two (2) rows of oil sweeps in two (2) separate locations in the ditch area.
A very light sheen was seen on the surface of the water.
Crew then mobilized to the LE Carpenter / Wharton property.
Met with on-site representative Dave Condon to unlock the fence surrounding the premises.
Crew flipped two (2) rows of 8" oil booms and replaced one (1) row of 8" oil boom and one (1) row of oil sweeps in the mouth of the seep area.
Visible ground contamination seen in collection area in the mouth of the seep area.
Seep area was fairly wet with no running water.
Contaminated booms and sweeps were bagged and placed into 55 gallon steel drums for disposal. Clean up activities generated three (3) drums for disposal.
Labeled and staged drums on the L.E. Carpenter / Wharton property.
Photographed site.
Clean and secured site.

RRI communicated site activities and email site photos to RMT representative Nicholas Clevett on 8-23-04

Customer Signature: _____ Representative: Scott Nothstein
Date: _____ Date: August 11, 2004

Original - Customer Copy

RAPID RESPONSE Inc.
14 Brick Kiln Court, Northampton, PA 18067
Tel. (484) 275-6900 Fax (484) 275-6970
www.RRI - hazmat.com

DAILY RECORD

Project #: Ground Contamination Control
Date: Wednesday, August 25, 2004
Customer: RMT Inc. / LE Carpenter & Co.
Customer Contact: Nick Clevett
Job Location: 170 N. Main St., Wharton, NJ 07885
Customer Phone: 616-780-2398

Names	Code	Start	On Site Start	On Site Finish	Finish
S. Nothstein	RM	0800			1230
B. Rehrig	RT	0800			1230

QTY.	Material Description
2	Health & Safety Level D
1	8" Oil Booms / Bales
1	Oil Sweeps / Bales
	Heavy Mill Garbage Bags

EQUIPMENT	QTY	EQUIPMENT	QTY	DISPOSAL / MANIFEST
Response Truck	1			
Digital Camera	1			

JOB DESCRIPTION/REMARKS

Mobilized equipment and crew to site. Conducted Health and Safety meeting with all on-site personnel.
Air Products Property: Crew used key supplied by Air Products Representative Janet Sanders to unlock the fence surrounding the premises.
Crew flipped all 8" oil booms and replaced two (2) rows of oil sweeps in two (2) separate locations in the ditch area.
No visible product or sheen was seen on the surface of the water.
Photographed site. Clean and secured Air Products property.
Crew then mobilized to the LE Carpenter / Wharton property.
Met with on-site representative Dave Condon to unlock the fence surrounding the premises.
Crew flipped one (1) row of 8" oil booms and replaced two (2) rows 8" oil booms and one (1) row of oil sweeps in the mouth of the seep area.
Visible ground contamination seen in collection area in the mouth of the seep area.
Seep area was fairly dry with no standing water.
Contaminated booms and sweeps were bagged and placed into 55 gallon steel drums for disposal.
Clean up activities generated one (1) drum for disposal.
Labeled and staged drum on the LE Carpenter / Wharton property..
Photographed site. Clean and secured site.
RRI communicated site activities and email site photos to RMT representative Nicholas Clevett on 9-7-04

Customer Signature: _____ Representative: Scott Nothstein
Date: _____ Date: August 25, 2004

Original - Customer Copy

RAPID RESPONSE INC.
An RMT and EWMI
14 Brick Kiln Court, Northampton, PA 18067
Tel. (484) 275-6900 Fax (484) 275-6970
www.RRI - hazmat.com

DAILY RECORD

Project #: Ground Contamination Control
Date: Wednesday, September 8, 2004
Customer: RMT Inc. / LE Carpenter & Co.
Customer Contact: Nick Clevett
Job Location: 170 N. Main St., Wharton, NJ. 07885
Customer Phone: 616-780-2398

Names	Code	Start	On Site Start	On Site Finish	Finish
B. Rehrig	RM	0830			1330
D. Scholtis	RT	0830			1330

QTY.	Material Description
2	Health & Safety Level D
4	8" Oil Booms / bales
1	Oil Sweeps / Bale
4	55 Gallon Steel Drums
	Heavy Mil Garbage Bags

EQUIPMENT	QTY	EQUIPMENT	QTY	DISPOSAL / MANIFEST
Response Truck	1			
Digital Camera	1			

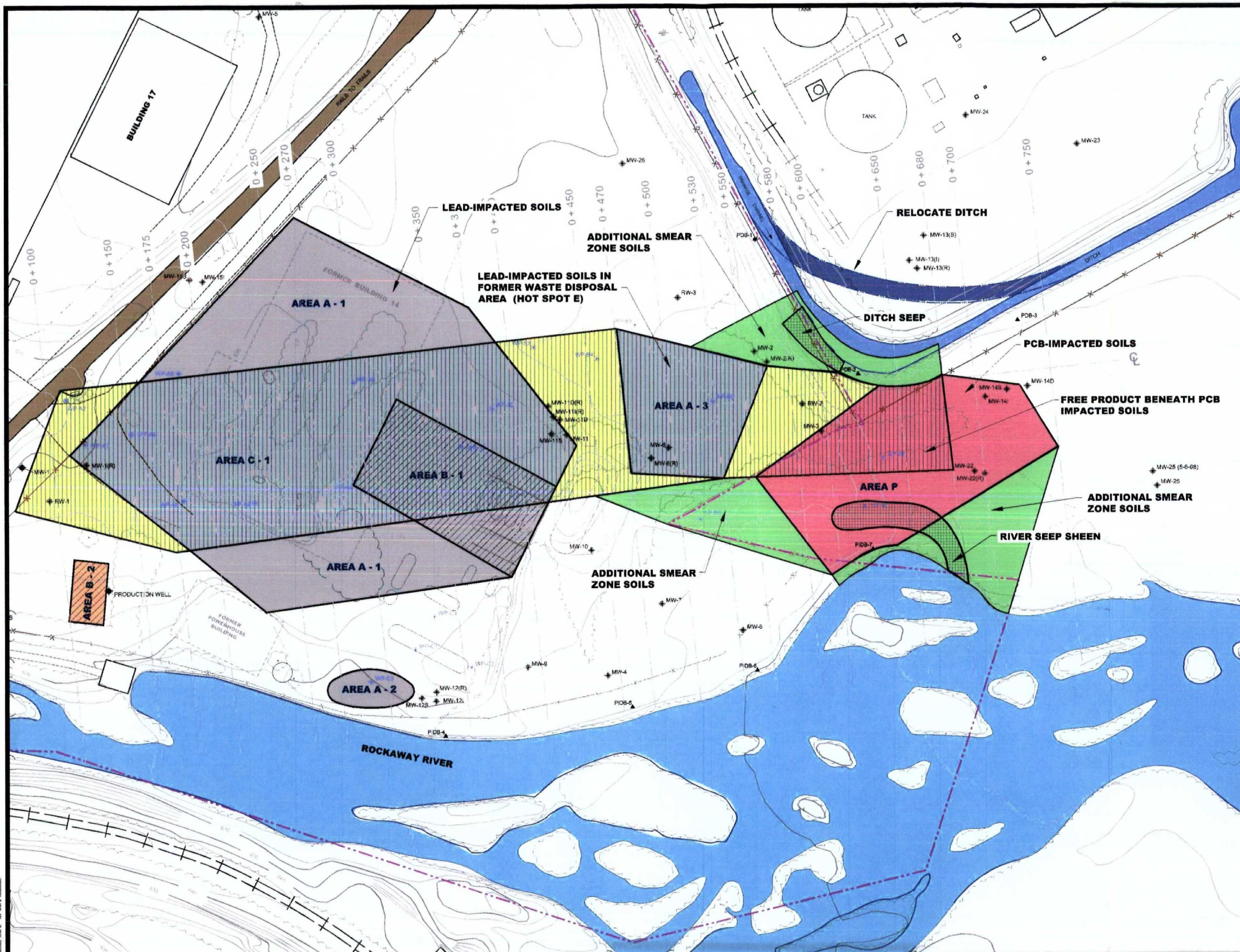
JOB DESCRIPTION/REMARKS

Mobilized equipment and crew to site. Conducted Health and Safety meeting with all on-site personnel.
Air Products Property: Crew used key supplied by Air Products Representative Janet Sanders to unlock the fence surrounding the premises.
Crew replaced four (4) rows of 8" oil booms and two (2) rows of oil sweeps in two (2) separate locations in the ditch area.
No visible product or sheen was seen on the surface of the water.
Photographed site. Clean and secured site.
Crew then mobilized to the LE Carpenter / Wharton property.
Met with on-site representative Dave Condon to unlock the fence surrounding the premises.
Crew replaced three (3) rows of 8" oil booms and one (1) row of oil sweep in the mouth of the seep area.
Visible ground contamination seen in collection area in the mouth of the seep area.
Seep area was fairly dry with no standing water.
Contaminated booms and sweeps were bagged and placed into 55 gallon steel drums for disposal.
Clean up activities generated four (4) drums for disposal.
Labeled and staged drum on the LE Carpenter / Wharton property.
Photographed site. Clean and secured site.
RRI communicated site activities and email site photos to RMT representative Nicholas Clevett on 9-8-04

Customer Signature: _____ Representative: Brian Rehrig
Date: _____ Date: September 08, 2004

Original - Customer Copy

EXPANDED SOURCE REDUCTION REMEDIAL AREA



LEGEND

- APPROXIMATE PROPERTY LINE
- FENCE LINE
- TREES
- SOILS > 400mg/kg LEAD
- PROCESS WASTE AFFECTED SOILS
- COPPER IMPACTED PROCESS WASTE SOILS
- CLEAN SOILS
- PCB IMPACTED SOILS (INCLUDES FREE PRODUCT)
- UNDERLYING FREE PRODUCT SOILS AT DEPTH
- ADDITIONAL SMEAR ZONE SOILS PROPOSED FOR EXCAVATION AS A RESULT OF RECENT PRODUCT RELEASES AND SECOND QUARTER PDB SAMPLING RESULTS AND GROUNDWATER MONITORING OBSERVATIONS

AREA A-1 LEAD IMPACTED SOILS > 400 mg/kg LEAD AROUND FORMER BUILDING 14

AREA A-2 ISOLATED HOT SPOT LEAD > 400 mg/kg

AREA A-3 SOILS > 400 mg/kg LEAD IN FORMER WASTE DISPOSAL AREA (HOT SPOT E)

AREA B-1 AREA CONTAINING MULTI COLORED PROCESS WASTE

AREA B-2 AREA CONTAINING COPPER IMPACTED PROCESS WASTE

AREA C-1 FREE PRODUCT SMEAR ZONE SOILS

AREA P PCB IMPACTED SOILS

NOTES

1. BASE MAP DEVELOPED FROM TOPOGRAPHIC SURVEY PROVIDED BY JAMES M. STEWART, INC. LAND SURVEYORS, DRAWING NO 2793-03.DWG, DATED 02-14-02.

NO.	BY	DATE	REVISION	APP'D.
5.				
4.				
3.				
2.				
1.				

L.E. CARPENTER
WHARTON, NEW JERSEY

MODIFIED REMEDIATION AREAS

DRAWN BY: SJL	SCALE: SHOWN	PROJECT NO. 6527.01	
CHECKED BY: JJD		FILE NO. 6527 MRA.DWG	
APPROVED BY:	DATE PRINTED:	**FIGURE 1**	
DATE: JULY 2004			

RMT INC.
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ANN ARBOR, MI. 48108-2237
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FAX: 313-971-9022